UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 03 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert W. Kronable III
Environmental Manager
Chemical Waste Management
36964 Alabama Highway 17 North
Emelle, Alabama 36619

SUBJ: RCRA Compliance Evaluation Inspection
Chemical Waste Management
EPA ID# ALD000622464

Dear Mr. Kronable:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the November 17-20, 2015, inspection of Chemical Waste Management located at 36964 Alabama Highway 17 North in Emelle, Alabama. This was an EPA Compliance Evaluation Inspection (CEI) for the purpose of evaluating the facility's compliance status with the applicable Resource Conservation and Recovery Act (RCRA).

Enclosed is the CEI report that indicates that apparent deficiencies of RCRA were discovered. A copy of this report has been forwarded to the Alabama Department of Environmental Protection (ADEM).

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

for

Héctor M. Danois
Acting Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch

Enclosure

Cc: Jonah Harris, ADEM (sent via e-mail)

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FEB 03 2016

Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Chemical Waste Management
EPA ID# ALD000622464

Dear Mr. Crockett:

On November 17-20, 2015, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at Chemical Waste Management in Emelle, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is the CEI report that documents apparent violations of RCRA. The EPA considers this facility to a significant non-complier.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

for

Héctor M. Danois
Acting Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch

Enclosure

RCRA Inspection Report

Inspector and Author of the Report

Kimberly V. Chavez
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US Environmental Protection Agency
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Facility Information

Chemical Waste Management
36964 Alabama Highway 17 North
Emelle, Alabama 36619
Sumter County
EPA ID# ALD000622464

Facility Point of Contact

Robert W. Kronable III, Environmental Manager

Inspection Participants

Kimberly V. Chavez—US EPA
Paula A. Whiting—US EPA
Jonah Harris—ADEM
Linda J. Knickerbocker—ADEM
Dee Dee Canionero—ADEM
Bailee L. Dykes—ADEM
Mike Davis—Chemical Waste Management
Al Talbott—Chemical Waste Management
Nelson Sturdivant—Chemical Waste Management
Robert W. Kronable III—Chemical Waste Management

Dates of Inspection

November 17-20, 2015

Applicable Regulations

Resource Conservation and Recovery Act (RCRA), 42 U.S.C.A §§6901 to 6992

Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§6925 and 6927
40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

ADEM Administrative Code 335 Division 14

ADEM Hazardous Waste Permit Number ALD000622464

Purpose of Inspection

The purpose of this inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine Chemical Waste Management's (CWM Emelle), EPA ID#ALD000622464, compliance with the applicable regulations.

Facility Description

Chemical Waste Management, Inc. in Emelle, Alabama, is a permitted commercial hazardous waste and chemical waste treatment, storage, and disposal facility. CWM Emelle accepts hazardous and polychlorinated biphenyl (PCB) wastes in both containers and bulk shipments. The facility receives wastes from many manufacturing sectors and federal and state clean-up projects. Hazardous wastes received by the facility may be blended and bulked prior to being shipped off-site for further treatment or recovery, decanted and stored prior to shipment offsite, processed prior to on-site landfilling or off-site disposal, or placed directly in the on-site landfill depending on the applicable treatment standards. CWM Emelle is currently in the process of renewing its Hazardous Waste Permit that expired on September 15, 2015.

CWM Emelle is located on 2,700 acres with 650 active acres (see Attachment B). It employs a total of approximately sixty-nine (69) on-site employees, which includes 12-15 contractors/temporary employees (see Attachment C). The facility operates 5 days per week, 8 hours per day (unless a special project requires otherwise).

CWM Emelle's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated February 17, 2015, characterized the facility as a large quantity generator (LQG) of hazardous waste, a commercial treatment, storage and disposal facility, a transporter, a transfer facility, an importer of hazardous waste, a large quantity handler of universal waste, and a used oil generator and re-refiner.

Currently, CWM generates used oil, universal wastes, paint and solvent waste, lab waste and other wastes which include EPA waste codes D001-D043, F001-F039, K-listed, P-listed and U-listed wastes.

Previous Inspection History

On April 15-17, 2014, the US EPA Region 4 and ADEM inspectors conducted a compliance evaluation inspection where a total of ten violations were found at the time of the inspection. The violations returned to compliance by August 18, 2014 after a warning letter was issued.

Findings

Arrival and Opening Conference: November 17, 2015
At approximately 9:50 a.m. CST, US EPA and ADEM inspectors arrived at the CWM Emelle facility, presented their credentials to the security guard and signed in. The EPA and ADEM inspectors joined

facility personnel in Building 708 to conduct the opening conference. At the opening conference, introductions were conducted and inspectors requested a brief tour of the facility. After the tour, the inspectors (except for ADEM inspector Mrs. Linda Knickerbocker) performed a walk-through of the facility. Throughout the walk-through, Ms. Linda Knickerbocker remained in Building 708 to conduct the records review portion of the inspection. Below is a description of the various buildings and facility areas inspected during the walk-through and the observations made in those respective areas.

Robbie D. Wood 10-Day Transfer Facility: November 17, 2015

Robbie D. Wood, Inc. (RWD) is a hazardous waste transporter (EPA ID# ALD067138891) that is permitted to operate this 10-day transfer facility located on land owned by Chemical Waste Management. Action Resources is another transporter that uses the facility. The US EPA and ADEM inspectors were driven a half-mile outside of the CWM facility on Highway 17 to the 10-day transfer facility by Mr. Nelson Sturdivant. Mr. Sturdivant explained that the transfer facility is primarily used to store incoming raw waste, in tarp-covered roll-offs, until the CWM Emelle facility can accommodate their arrival. He also explained that the facility is accessible to RWD and Action Resources drivers 24 hours a day via a combination-lock entrance. The transfer facility has a perimeter fence on all four sides with a small under-roof area that contains a small office where logs and manifests are maintained and a storage area for damaged containers. Mr. Sturdivant explained that liquid wastes are only allowed to be stored at the facility for 24 hours due to the lack of secondary containment. When dropping-off a load, drivers are responsible for completing the *Yard Inventory Log* which lists the container #, manifest #, generator name, driver name, drop-off date and time, and the delivery (exit) date.

During the inspection of the transfer facility, the inspectors interviewed Mr. John Burke, the shop supervisor. Mr. Burke could not confirm the size of the facility or the years of operation. After close review of the yard inventory log, the inspectors found that three containers that arrived on 11-6-2015 did not have a delivery/exit date (see Photo #1). Mr. Burke explained that those three containers of CWM rejected waste were actually removed from the transfer facility on 11-13-2015 but the driver did not enter the information into the log. He also explained that he had already reached out to Ms. Rhonda Eve, the RDW dispatcher, to verify the date and times those containers were removed from the facility in order to enter that information into the log. According to Mr. Burke, one of the three containers was still at the facility on Friday evening. This information was confirmed by the revised yard inventory log that was provided to the inspectors later in the day (see Attachment D).

The inspectors then completed a walk-through of the un-covered portion of the facility. As explained by Mr. Burke, containers possessing waste are typically lined against the north-side gate of the facility while empty containers are primarily kept against the south fence. Upon close review of roll-offs with hazardous waste labels, the inspectors found a number of labels that were damaged (see Photo #2), and incomplete (see Photo #3). Other roll-offs containing non-hazardous PCB wastes were also present (see Photos #4-5). The manifest for the container with the damaged hazardous waste label list manifest # 013951484, generator AES and the drop date 11-12-15. Per the manifest, the roll-off contains D009 waste. All other log entries reviewed did not exceed the 10-day transporter storage time limit.

After visually confirming the present containers with those listed on the yard inventory log, the inspectors found container #1038 still on-site although according to the log the container was signed out on 11-17-15 at 8:00 a.m. and the manifest was no longer present. According to Mr. Burke, he believed that the manifest was taken by the driver and the log date and time was erroneously entered. He told the inspectors that he would ensure the container is removed from the facility before the end of the day. A roll-off was located on site that was not listed in the yard inventory log. Upon further discussion with

Mr. Burke, he explained that this roll-off contained on-site generated waste, specifically dirt and gravel mixed with spilled hydraulic oil. He also explained that once the roll-off contains "enough" waste, it is sent to RWD's main office for disposal.

All roll-offs containing hazardous waste were covered with tight-fitting tarps although a number of hazardous waste labels were not adequately completed and/or faded/damaged.

Trench 22, Cell #4, Hazardous Waste Landfill: November 17, 2015

EPA inspector, Kimberly V. Chavez, and ADEM inspectors, Jonah Harris and Dee Dee Canionero, accompanied by Mr. Nelson Sturdivant, entered the active cell (#4) in Trench 22. Mr. Sturdivant described the coordinate system layout of the cell and explained that disposal in the landfill is conducted according to the facility's various Standard Disposal Procedures, or SDPs (see attachments E-I). The coordinate system for Trench 22 uses alphabet letters to identify quadrants running east to west and numbers to identify sections running north to south. A waste container's position in the landfill can therefore be identified by a single letter and number combination (i.e. P-10) and level, or a series of letters and numbers to trace its exact location in the trench/cell. GPS coordinates are not used by the facility at this time.

During this portion of the inspection, the inspectors first observed a collection of approximately 50 unburied macroencapsulation vaults (see Photo #6) within the coordinates of O-P and 11-12, level five (5). Mr. Sturdivant explained that each macroencapsulation vault could contain waste from different clients/generators. The vaults are manufactured by Waste Management and made of high-density polyethylene (HDPE), with the capacity to hold 20 cubic yards of waste. Each vault was sealed and had a hazardous waste label identifying the original container #, generator information, EPA waste #, date of receipt, profile # in AS400, and manifest tracking # (see Photo #7). The inspectors selected the macroencapsulation vault containing wastes from Manifest # 013859918JJK to later cross-reference against the facility's burial logs. During records review, Ms. Linda Knickerbocker was able to verify that the facility's burial records did in fact coincide with the burial coordinates observed by the inspectors during their inspection of the active cell (see Attachment J).

The inspectors also observed containers of non-hazardous waste, near the macroencapsulation vaults in Cell #4, including over one hundred (100) 55-gallon steel and plastic drums, a cardboard box, large machinery, and large containers similar to roll-offs (see Photos #8-12).

Building 1400: Tank Farm and Control Room: November 17, 2015

The Tank Farm, also known as Building 1400, consists of 16 individual tanks that allow for a total storage capacity of five million gallons (4 500,000-gallons and 12 250,000-gallons) of both raw and treated leachate. The tanks are identified numerically, beginning with "T-1405" through "T-1420." During the inspection of the Tank Farm, the inspectors interviewed Mr. Kent Jones, the Tank Farm Stabilization Supervisor. Mr. Jones explained that all tanks were currently active, except for 1414 which was begin sandblasted (in preparation for internal coating) and 1416 which was temporarily out of service. According to Mr. Jones, leachate from the landfill is first pumped into tanks 1701-1704 (located in the Leachate Tank Farm) and later pumped into T-1420 where solids are allowed to settle and then leachate is manually pumped to Building 2000 for treatment. After treatment, the treated leachate is pumped via underground piping to "clean" tanks: 1412, 1414, 1417, and 1419. As explained by Mr.

Jones, the facility then uses the treated leachate as an input to make slurry water for stabilization or for dust suppression within the landfill.

During the walk through of the Tank Farm, the inspectors observed a variety of maintenance equipment in different areas of the Tank Farm. The inspectors observed equipment throughout which Mr. Jones explained was being used for the on-going maintenance and repair work being performed to correct issues with the Tank Farm's secondary containment (see Photo #13). Mr. Jones confirmed that a remedial work order (see Attachment K) had been submitted to repair the areas of concern identified by the inspectors.

Upon entering the Tank Farm control room, Mr. Jones showed the inspectors a copy of the most recent Tank Farm shift summary, dated 11-09-2015 (see Attachment L), which provides precise measurements for the volume and contents of each tank and the Tank Farm's total in-flow/out-flow information for that day. According to Mr. Jones, the Tank Farm shift summary is completed on a daily basis. The following day, the facility provided a more recent shift summary to the inspectors, dated 11-16-2015 (see Attachment L). When exiting the control room, the inspectors observed one (1) 55-gallon drum labeled "Hazardous Waste" that was at capacity (see Photos #14-15). Mr. Jones explained that the drum was used as a satellite accumulation area for used/contaminated PPE (personal protective equipment) and emptied every thirty (30) days regardless of the amount of waste accumulated at that point. However, at the time of the inspection the drum was full and not yet dated.

Pursuant to ADEM Administrative Code R. 335-14-3-.03(5)(c)(2) [40 C.F.R. § 262.34(c)(2)]. The generator must mark the container holding the initial amount of hazardous waste with the date the initial amount was reached. CWM Emelle failed to mark the satellite accumulation drum of PPE waste with the date the drum reached its capacity of 55-gallons of hazardous waste.

When discussing the issue with facility personnel at the end of day, Mr. Mike Davis explained that the container is emptied every thirty (30) days into roll-off RO428-20 (see Attachment M). The inspectors explained federal regulations stipulate that when a container reaches capacity, the container must then be dated and wastes/containers removed within 72 hours (3 days) regardless of the transfer methodology employed by the facility.

Building 708: Wet Chemistry Lab: November 18, 2015

On the second day of the inspection, the inspectors began by visiting the laboratory area in Building 708. Throughout the different lab sections/rooms, the inspectors were accompanied by Mr. Guy Coughlin, the technical manager, unless otherwise indicated. The facility's laboratory is comprised of three smaller labs: the wet chemistry lab, the inorganic lab, and the organic lab, along with other ancillary rooms/areas such as sample storage and the liquid extraction room. Within the wet chemistry lab, the inspectors interviewed Mr. Keon Little, a chemist, regarding the laboratory's functions and procedures. Mr. Keon explained that the lab is responsible for performing analysis (e.g. "fingerprint" analysis, TCLP, etc.) on the samples taken from the drum storage and bulk sampling building. After they complete their analysis, the lab then places a small rectangular label and a pH category label on the sample. The sample is then put into its respective bin within the lab according to its pH category label and later moved to the lab's storage area.

During the time of the inspection, the inspectors observed a total of nine hazardous waste satellite accumulation containers in the wet chemistry lab. These containers consisted of five (5) six-gallon step

cans and four (4) two-gallon HPLC waste cans. All of the HPLC waste cans were kept within one of the lab's six fume hoods. All containers, not currently in use, were adequately labeled as hazardous waste and closed.

On the far end of the wet chemistry lab, behind a partial wall, the inspectors observed a satellite accumulation area containing two (2) 55-gallon drums stored side-by-side (see Photo #16). The drums contained sample waste generated by the lab that are then segregated into these containers based on the facility's designated treatment method for the waste stream type (incineration or stabilization). The current layout of this satellite accumulation area puts CWM Emelle accumulation limit of 55 gallons on hazardous waste.

Pursuant to ADEM Administrative Code R. 335-14-3-.03(5)(c)(1)]40 C.F.R. §262.34(c)(1)]. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste (...) in containers at or near any point of generation where the wastes initially accumulates, provided the generator complies with ADEM Admin. Code r. 335-14-3-.03(5)(c). CWM Emelle failed to ensure that the wet chemistry lab not accumulate hazardous waste in excess of 55 gallons, in a single, designated satellite accumulation area (SAA).

Per an electronically-available ADEM fact sheet regarding satellite accumulation of hazardous waste (see Attachment AF), ADEM "believes it is justified to allow satellite accumulation of up to 55 gallons (or one quart of acutely hazardous waste) for each distinct waste stream at or near its respective point of generation, even when the result is more than 55 gallons in total of different wastes being maintained in adjacent containers, so long as the various satellite accumulation containers are clearly **separated and delineated** to prevent mingling of the various waste streams." The placement of two fifty-five gallon waste containers, side-by-side, within a single satellite accumulation area does not appear to meet the ADEM exception/guidance outlined above.

According to Mr. Coughlin, the drum on the left-hand side, dated 11-2-2015, is used to collect TCLP extraction waste that will later be stabilized (see Photo #17). The drum on the right-hand side, dated 10-2-2015, is used to collect wastes that will later be sent for incineration (see Photo #18). Mr. Coughlin estimated that the drums typically take approximately two to four weeks to fill. When full, the drums are taken to the drum process container building (#700). Mr. Scott Taggart, the lab manager, is responsible for maintaining drum transfer records in the lab's transfer log.

Building 708: Sample Storage Room: November 18, 2015

The inspectors then proceeded to inspect the laboratory's sample storage room. The room contained five rows of shelving, each containing different types of sample waste containers (see Photos #19-24). According to Mr. Coughlin, the sample storage room is used to store both small amounts of treated and raw sample waste in various size containers of five-gallon, one-gallon, or one-pint capacity. Raw sample wastes are mainly kept for further testing and treatment recipe development. When the samples are no longer needed, they are either put into a 55-gallon waste container or roll-off container for subsequent disposal. Mr. Coughlin explained that the storage times vary but a container of sample waste may be kept in the storage room for up to four months. At the time of the inspection, all containers were closed and labeled with generator name, profile #, and hazardous waste codes (if hazardous).

The inspectors later confirmed that the room is an exempt sample storage area per 40 C.F.R. § 261.4(d).

Building 708: Inorganic Lab: November 18, 2015

The inorganic lab is separated into two different sections/rooms, the "clean" side and the "dirty" side. Upon entering the lab, the inspectors noticed that an epoxy coating had been recently applied to the lab's flooring. The lab contained various analytical machines including an ICP spectrometer, an auto sampler, and mercury analysis machine. These machines were connected, via plastic tubing, to waste containers of various sizes that collect residual hazardous waste from the operation of these machines. According to Mr. Coughlin, the containers take approximately three (3) months to fill. Once full, the lab technician is responsible for transferring the waste containers to Building 2200 (roll-off storage). This side of the inorganic lab contained a total of five (5) hazardous waste containers of various sizes, with the capacity to hold an aggregate volume of approximately forty-six (46) gallons. The "dirty" side of the inorganic lab contained a total of three (3) hazardous waste containers of various sizes, with the capacity to hold an aggregate volume of approximately thirty-six (36) gallons. All containers observed on both sides of the lab were closed and adequately labeled as containing hazardous waste.

Building 708: Organic Lab: November 18, 2015

During their inspection of the organic lab, the inspectors interviewed Mr. David Kendrick, a senior chemist. According to Mr. Kendrick, the organic lab is primarily responsible for "prepping samples for PCBs." The lab contained a fixed speed vortex mixer and one (1) 30-gallon container of hazardous waste labeled with the words "empty daily." Upon examining the contents of the container, the inspectors observed both food waste co-mingled with lab waste. Mr. Kendrick confirmed that he had emptied the container the day before and verified that each lab technician is responsible for emptying the hazardous waste containers under their own personal use.

Building 708: Liquid Extraction Room: November 18, 2015

Mr. Kendrick then accompanied the inspectors into the laboratory's liquid extraction room. It is in this room that semi-volatile extractions are run for 12-16 hours in a closed system. The extraction process produces methylene chloride which is captured and collected into two (2) one-gallon jugs stored in a bin on the room's floor. The room also contained a 33-gallon hazardous waste container and a 6-gallon waste can that was empty at the time of the inspection. According to Mr. Kendrick, he personally transfers the hazardous waste generated in the liquid extraction room to the satellite accumulation drum in the wet chemistry lab designated for incineration waste.

Building 1200A: Stabilization Control Room and Baghouses: November 18, 2015

The inspectors entered the control room of Building 1200A and met Mr. Fayette Campbell. From the control room, the inspectors were able to view the operations underway in the two "vats" below. At the time of the inspection, an industrial excavator was actively mixing a waste load in Vat #1 (left-hand side) and suited-employees were cleaning/washing-off the area surrounding Vat #2 (right-hand side).

The inspectors later visited the two (2) baghouses located on each end (east and west) of Building 1200A, accompanied by Mr. Nelson Sturdivant. Each baghouse captures ambient dust produced from the mixing of waste in each of the building's two vats. The captured dust is collected in a thirty (30) yard roll-off labeled as hazardous waste with the generator information, and waste profile #000309. Both roll-offs observed in the east and west baghouses were dated 10/10/2015. According to Mr. Sturdivant, the baghouse roll-off are removed every ninety (90) days. Upon observing the condition of

the baghouses, condensation was evident on the cement floors although no pools were observed at the time of the inspection.

Later this same day, ADEM inspectors took a split post-treatment sample of solidified sludge waste for corroborate testing/analysis. CWM Emelle provided the shipment receipt, manifest, and waste profile summary for the specific waste associated with this sample (see Attachment N). On January 7, 2016, ADEM shared the results of their analysis with EPA (see attachment AG). According to ADEM's analysis report, the total metals content of the sample did not exceed regulatory maximum concentration levels for hazardous waste.

Building PK-2200: November 18, 2015

The following building visited by the inspectors was PK-2200, a one-year permitted storage area for RCRA and PCB hazardous waste streams with the capacity to store up to one hundred and five (105) total roll-offs. The building has a corrugated roof and is open on both sides for easy loading and off-loading of roll-offs and other waste containers. The building's flooring is separated into two separate bays with one bay completely enclosed by spill containment curbing to fulfill TSCA waste storage requirements. The flooring for both bays is angled towards the center where spill containment catch basins are present. Upon examination of the condition of the building's secondary containment, the inspectors observed rubber strips that are secured to the floor by large industrial-size nails. These strips are meant to protect the integrity of the floor from potential damage from moving roll-offs. However, it is unclear whether the penetration of these nails into the flooring compromises the floor's condition and impermeability. Condition is difficult to verify without the ability to remove the rubber strips for further examination.

The inspectors were accompanied by Mr. Nelson Sturdivant. He explained that stored wastes found in this building are stored there for various reason including: waiting for disposal, treatment or post-treatment analysis results as well as loads slated to go off-site for incineration. According to Mr. Sturdivant the facility is careful and proactive to avoid exceeding the one-year storage limit by labeling containers with the date the waste arrived on-site from the generator as the start accumulation date. No hazardous waste and/or safety signage was affixed to the building except for "No Smoking" placards. The inspectors observed fire extinguishers attached to posts throughout the building.

At the time of the inspection, the storage area contained approximately ninety-two (92) roll-offs, twenty-two (22) pallets of ferrous sulfate, thirteen (13) super sack bulk bags, and three (3) trailers (one containing large machinery/equipment). Among the roll-offs, the inspectors observed a hazardous waste label with the year scratched off (see Photo #25) but were later informed by Mr. Sturdivant that another label with the appropriate date was affixed to the other end dated 7/24/2015. The inspectors also observed another label, for roll-off RO24-124, with a very faded date (see Photo #26). A waste transfer log was later provided by the facility for this roll-off confirming that it contained waste from Duke Energy and was "reloaded into RO24-124 on 11/12/2015" (see Attachment O).

The inspectors also observed two roll-offs (RO6014 and RO965-2) that were stored in positions that obscured the view of their labels. CWM facility personnel later provided a waste shipment receipt for RO6014 (see Attachment P) and a waste transfer log for RO965-2 (see Attachment Q) to demonstrate waste receipt/transfer dates.

Building 606: Facility Maintenance Shop: November 18, 2015

The inspectors then visited Building 600 and interviewed Mr. Dewayne Speight, an environmental technician that works in this maintenance shop. According to Mr. Speight, facility electricians and other personnel to work on pumps, welding, and general facility support on a small scale. After reviewing the indoor area and viewing no hazardous waste, the inspectors also examined an outdoor area that is used by the shop for additional storage. In this outdoor area, the inspectors observed a 30-gallon satellite accumulation drum for empty aerosol cans, one-third full at the time of the inspection. Mr. Speight explained that once full, the drum is transferred to Building 700 (drum process/management) for staging and then sent off-site for incineration when fifty-five (55) gallons or more are accumulated.

Building 300: Heavy Equipment Shop: November 18, 2015

Upon arrival at the heavy equipment shop, the inspectors interviewed Mr. Paul Howard, the shop lead. Mr. Howard explained that this shop is primarily used to service the facility's fleet of vehicles and large machinery (e.g. forklifts). Near a vehicle workstation within the shop, the inspectors observed two (2) 55-gallon satellite accumulation drums for hazardous waste placed side-by-side (see Photo #27). The drum on the right-hand side contained (drained) used oil filters and was at capacity at the time of the inspection (see Photo #28-top removed to show volume of waste). The drum on the left-hand side (see Photo #29) contained used antifreeze and was approximately a quarter full at the time of the inspection. The side-by-side placement of two 55-gallon drums in this single satellite accumulation area as well as the lack of a label date on a hazardous waste container means that CWM Emelle is in apparent violation of the following:

Per an electronically-available ADEM fact sheet regarding satellite accumulation of hazardous waste (see Attachment AF), ADEM "believes it is justified to allow satellite accumulation of up to 55 gallons (or one quart of acutely hazardous waste) for each distinct waste stream at or near its respective point of generation, even when the result is more than 55 gallons in total of different wastes being maintained in adjacent containers, so long as the various satellite accumulation containers are clearly **separated and delineated** to prevent mingling of the various waste streams." The placement of two 55-gallon waste containers, side-by-side, within a single satellite accumulation area does not appear to meet the ADEM exception/guidance outlined above.

According to Mr. Howard, both waste streams are managed as hazardous waste by the facility and are handled according to their appropriate waste profiles (see Attachment R). At the time of the inspection, the capture drum for the drained waste oil was in use and labeled as hazardous waste. Mr. Howard explained that once the drums are full, the shop personnel notify drum process to retrieve the waste and complete a waste transfer log.

Immediately outside of the shop, the inspectors observed three identical storage tanks (with a capacity of approximately 1000 gallons) in a bay area equipped with secondary containment. According to Mr. Howard, two of the tanks contained product while the other contained used oil.

Building 402: Robbie D. Wood Maintenance Shop: November 18, 2015

The inspectors then traveled to Building 402 and interviewed Mr. John Burke, a Robbie D. Wood employee. According to Mr. Burke, the shop is primarily used to service Robbie D. Wood (RDW) trucks and tires, although CWM roll-offs are also repaired when needed. During their walkthrough of the shop,

the inspectors observed one (1) 55-gallon satellite accumulation drum containing empty aerosol cans approximately three-quarters full at the time of inspection. Mr. Burke explained that when the drum reaches capacity, shop personnel notify bulk process.

The inspectors also observed one (1) 55-gallon drum of used oil and a smaller nearby container (approximately 20-gallons) used to catch used oil while performing service on a vehicle. Also, directly outside of the shop, two roll-off containers were observed by the inspectors. According to Mr. Burke, one container is used to collect scrap iron which is later sent to RDW's main office and sold. The second roll-off is used to collect site-generated non-hazardous waste.

Building 700: Secondary Drum Sampling/Management: November 19, 2015

On the third day of the inspection, the inspectors accompanied by Mr. Guy Coughlin, began their walkthrough by visiting the drum management storage area in Building 700 which is a permitted one-year storage area. Upon entering the building, the inspectors observed two (2) 55-gallon satellite accumulation drums for used PPE in the entrance bay area (see Photo #30). The drum on the left-hand side was labeled as non-hazardous waste (see Photo #31), while the drum on the right-hand side was labeled as hazardous waste (see Photo #32). Both drums were dated 8-26-15. According to Mr. Coughlin, the drums are meant to separate contaminated PPE from non-contaminated PPE.

After exiting the bay area and entering the main building, the inspectors met and interviewed Mr. Mark West, the drum processing supervisor. According to Mr. West, this building runs a secondary sampling operation for incoming drums. The drums arrive to the building either by truck drop-off or through conveyor transfer from Building 702. After their analysis, the lab provides a small, rectangular treatment decision label to adhere to the drum. The drum then remains within the building until the facility is ready to treat. Mr. West explained that both a daily receipt log and inventory log are kept to record all in-coming/out-going drum transfers. The drums are organized into rows identified by ceiling-hung numeric placards (#26-40). The containers stored in this building are primarily 55-gallon metal and plastic drums and super sacks.

Upon close examination of all containers, the inspectors observed a pair of super sacks that were covered with a plastic tarp secured with adhesive tape which restricted the visibility of the hazardous waste labels. According to Mr. West, the facility placed the tarp over the containers because the sacks were damaged. After hearing the inspector's concerns, Mr. West immediately repositioned the hazardous waste labels to increase their visibility. Before exiting the building, the inspectors spoke with Mr. West to express their concerns about the potential for cross-contamination in the bay area when containers for two different waste streams are placed in such close proximity. The inspectors also explained to Mr. Coughlin and Mr. West that satellite accumulation drums of hazardous waste must be dated when full (instead of the date when first put into use) and moved to the appropriate storage area within 72 hours/3 days.

All other observed containers in this building were adequately labeled as hazardous waste, dated, and closed.

Building 702: Main Drum Sampling/Management: November 19, 2015

The inspectors, accompanied by Mr. Coughlin and Mr. West, then moved on to inspect Building 702, the main sampling operation for the facility. Upon entering the building, the inspectors observed similar PPE satellite accumulation containers/practices, as described above in Building 700. According to Mr. West, the procedures executed in this building resemble those mentioned above in Building 700. Samples from incoming containers are taken within 72 hours of arrival. After "fingerprint" analysis is completed by the lab, drums are then stored, treated and disposed of per the lab's treatment determination. Drum contents that are either non-hazardous or sufficiently treated to meet the Land Disposal Requirements (LDR) require no additional treatment.

All observed containers in this building were adequately labeled as hazardous waste, dated, and closed.

Building 604: TSCA and RCRA Drum Storage: November 19, 2015

The inspectors, accompanied by Mr. Coughlin and Mr. West, then moved on to inspect Building 604, primarily used for PCB and RCRA waste drum storage. Upon entering the building, the inspectors observed similar PPE satellite accumulation containers/practices, as described above in Buildings 700 and 702. According to Mr. West, this building is another secondary sampling and storage area for TSCA and RCRA waste containers. At the time of the inspection, all drums were covered with black plastic tarps. Mr. West explained that the drums are covered by the facility because they contain water reactive solids (D003). He explained that the drums were all from the same generator: DuPont Co.

In one corner of the building, the inspectors observed two (2) 55-gallon drums of site-generated hazardous waste dated 11-9-2015 (see Photo #33). Mr. West explained that the drums contained rinse water and wash for the cleaning of sampling instruments and were still currently in use. According to Mr. West the drums are typically labeled as hazardous waste and dated as of the date of first use. The inspectors explained to Mr. West that this method of labeling and dating is inconsistent with best management practices because the contents of the drums are still in use and are therefore not waste nor require dating.

All observed containers in this building were adequately labeled as hazardous waste, dated, and closed.

Building 600: TSCA/RCRA Processing: November 19, 2015

The inspectors, still accompanied by Mr. Coughlin and Mr. West, then proceeded to inspect Building 600, a TSCA/RCRA processing area. In this building, the inspectors observed three (3) storage and flush tanks (T-634, T-635, and T-636), each with a capacity to hold 10,000 gallons. According to Mr. West, two of the tanks (T-634 and T-635) are used to store PCB-contaminated fluids from flushing transformers while the other tank (T-636) is used to store mineral oils, utilized to flush clean PCB-contaminated equipment. Once full, tanks T-634 and T-635 are pumped into a Robbie D. Wood tanker and sent off-site to a PCB incinerator.

Near the tanks, the inspectors observed a group of containers that Mr. West explained were waiting on lab results and other treatment-related discrepancies. All observed containers in this building were adequately labeled as hazardous waste, dated, and closed.

Building 520: Hazardous Waste Tank and Storage Area: November 19, 2015

The inspectors, accompanied by Mr. Guy Coughlin and Mr. Mark West, then inspected Building 520, a one-year permitted storage area solely dedicated to store TSCA/RCRA waste. The inspectors observed a 25,000-gallon hazardous waste tank, a tanker, and two (2) roll-offs in this building/area. Although empty at the time of the inspection, Mr. Coughlin explained that when full, the waste held in the tank is sent off-site for incineration to a permitted PCB-incinerator, specifically Veolia in Texas. When inspecting the tanks connections and flanges, the inspectors observed its Subpart BB tags were painted over with white paint rendering them illegible (see Photo #34). According to Mr. Coughlin and Mr. West, the facility is aware of this issue and plans to correct it. However, among the open remedial work orders provided during the inspection, none of them seek to address this specific issue (see Attachment S). ADEM inspector, Mr. Jonah Harris, then climbed on top of the tank to inspect the vent and associated BB tags. No issues were found with the structural integrity of the tank.

At the time of the inspection the two roll-offs were full and staged in the area awaiting stabilization.

Building 603: Container Storage: November 19, 2015

The inspectors, accompanied by Mr. Guy Coughlin, then moved on to inspect Building 603, primarily used for container storage. Upon entering the building, the inspectors observed similar PPE satellite accumulation containers/practices, as described above in Buildings 700, 702 and 604. Mr. Coughlin explained that this building is used to store various types of wastes requiring off-site disposal. The building is sectioned and seperated by compatibility into three distinct areas, the first containing primarily spent fuels, the second containing wastes for reclamation (universal waste, empty aerosol cans, etc.) and the last section designated for used batteries and mercury waste containers.

The inspectors noticed approximately sixteen (16) steel five-gallon buckets (see Photo #35) labeled as mercury hazardous waste with start accumulation dates beyond the one-year storage limit (see Photo #36). Mr. Coughlin explained that the facility is allowed to store this waste longer than one year until a suitable off-site facility is equipped to receive this specific waste. This information coincides with the Mercury Export Ban Act which allows elemental mercury to be stored for longer than one year at any RCRA-permitted TSD facility (meeting specific conditions).

The inspectors observed various waste container types including pallets, drums, and totes. All observed containers in this building were adequately labeled as hazardous waste, dated, and closed.

Building 406: Roll-off Storage: November 19, 2015

Still accompanied by Mr. Coughlin, the inspectors next visited Building 406, a roll-off storage area. It houses fifteen (15) permitted slots to store roll-offs containing mixed hazardous waste streams awaiting analysis for treatment stabilization. No liquids are allowed to be stored in these spaces. At the time of the inspection the inspectors observed roll-off RO76 labeled with a start accumulation date of 9-25-2010 (see Photo #37). According to the facility, the label was incorrectly completed and promptly replaced with a corrected one dated 9-25-15 (see Photo #38). The facility also provided a container process report that reflected all of the different waste loads (including generator and manifest #) contained in the roll-off and the dates the wastes were received on-site (see Attachment T). The roll-off ID was hand written onto the container process report by facility personnel.

The inspectors also observed a significant volume of rainwater accumulated in the building's secondary containment (see Photo #39). The accumulated rainwater was likely collected during the wet weather event that occurred the day before.

Building 1700: Leachate Tank Farm (Tanks 1701 and 1702): November 19, 2015

The inspectors, accompanied by Mr. Dewayne Speight, a CWM environmental technician, moved on to inspect tanks 1701 and 1702 which are housed in an enclosed metal corrugated building with a concrete floor. According to Mr. Speight, these tanks each have a capacity of approximately 30,000 gallons and are fed raw leachate from four (4) separate pump houses. Both tanks were labeled and the secondary containment was in good condition. However, the inspectors observed a number of small puddles underneath the tanks from unknown origin (see Photos #40-41). Mr. Speight explained that the puddles likely originated from the wet weather event that occurred the day before.

Tanks 1703 and 1704: November 19, 2015

Still accompanied by Mr. Speight, the inspectors then went to inspect tank 1703 and 1704 (30,000 gallon capacity) which are housed in a similar structure to that containing tanks 1701 and 1702 described above, next to the pump house for Cell #3. The tanks receive leachate from Trench 22 and pump it to the facility's primary Tank Farm. At the time of the inspection, both tanks were shut down due to a power failure that occurred at the facility earlier in the day. According to the tank monitors/pumps, available in the control room, Tank 1703 was empty and Tank 1704 contained 36.61'' of leachate. Both tanks were labeled and the secondary containment area was in good condition. Both top of both tanks was also examined by the inspectors and no issues were observed.

Groundwater Monitoring Wells/Trenches: November 19, 2015

EPA inspector, Ms. Paula Whiting, and ADEM inspector, Mr. Jonah Harris, accompanied by Mr. Dewayne Speight, randomly selected ten (10) trenches to inspect during a windshield tour of the wells. Those selected included trenches 10, 16, 9, 17, 18, 19, 15, 8 and 12 (in this order). Issues concerning management and condition integrity were identified at trenches 10, 16, 9 and 8.

At trench 10, the concrete edge/casing around both SM-07 wells was missing (see Photos #42-43). At trench 16, the inspectors observed that the concrete base around PM17 was damaged (see Photos #44-45). At trench 9, the inspectors observed a black 55-gallon drum that was without a label (see Photo #46). Upon asking Mr. Dewayne Speight about the drum, he explained that the drum contained purge water used for sampling that had been conducted approximately a week prior to the inspection. Mr. Speight stated that the water was hazardous, although the facility later provided analysis documentation to demonstrate that the purge water was found to be non-hazardous (see Attachment U). At trench 8, risers were present but no wells were visible.

Building 900: Wheel Wash: November 19, 2015

The inspectors, accompanied by Mr. Nelson Sturdivant, then examined the facility's Wheel Wash, where vehicles exiting the landfill must first stop and wash their wheels and undercarriage. The purpose of the wheel wash is to prevent possible environmental contamination from vehicles and equipment that operate in the active landfill. Each vehicle goes through three wash cycles, the last wash is done using stormwater or city water. The building consists of two open wash areas, one side for automatic washes

and the other for manual washes, and a control room where the wash water tanks (901 and 902) and a sludge roll-off are housed.

Upon entering the control room, the inspectors interviewed Mr. Kent Jones. Mr. Jones explained that the wheel wash first takes "clean" water into tank 902 from the facility's stormwater basins and/or city water. The clean water is then used in the wash and pumped into a roll-off in the control room for filtering. Once the roll-off reaches a certain level, wash water is pumped into Tank 901 for reuse. According to Mr. Jones, filtered wash water can also go into Tank 902 and if full will then be pumped to the facility's primary Tank Farm, specifically Tank 1418. Ultimately, used wash water that is no longer usable in the wheel wash will be used as an input to make slurry water for stabilization.

At the time of the inspection, Tank 902 was leaking due to a broken pressure switch (see Photo #47). Mr. Sturdivant explained that the wash water tanks are labeled as hazardous waste due to a past negotiation with ADEM, although analytical has shown that the wash water meets treatment standards. The sludge roll-off was labeled with a start accumulation date and covered with a tight-fitting tarp.

Building 2000: Biological Treatment: November 20, 2015

On the fourth and final day of the inspection, the inspectors began by examining Building 2000, accompanied by Mr. Nelson Sturdivant. Earlier that morning, Mr. Sturdivant provided a flowchart for the biological treatment process (see Attachment V). The building contains three reactors which serve as an on-site wastewater treatment plant in which the leachate removed from Trench 22 is treated. The inspectors observed the treatment process from the observation deck above due to the building's safety concerns, specifically the concentration of hydrogen sulfide gas.

At the time of the inspection, the inspectors observed pools of liquid on the floor near the sludge tank (see Photo #48). After further examination, the inspectors also observed an obvious filtration into the building coming from a nearby wall (see Photo #49). Upon review of previous inspection reports from 2012 and 2014, this filtration is referenced in both reports. It is unclear whether this issue has ever been adequately addressed by the facility since it was first observed by inspectors. No remedial work order for this building was observed during the records review portion of the inspection.

Building 700 (North End): Secondary Drum Sampling/Management: November 20, 2015

The inspectors then traveled to the north end of Building 700, accompanied by Mr. Guy Coughlin. The area served as drum storage for rows arranged to be two-drums wide and two-drums high. Upon examining the drums and labels, the inspectors observed over twelve drums (that formed part of the same manifest) that did not have a start accumulation date on the CWM-generated labels (including the observed lab labels) for waste profile AL403320 (see Photos#50-52). Mr. Coughlin explained that the issue was possibly a clerical error that impacted the entire load from manifest 002735786GBF-1 (approximately 52 drums).

Pursuant to Permit Condition III.C.3. The sampling and staging of drums shall not exceed 72 hours. All containers that are to be fingerprinted or are awaiting analysis shall be segregated from other containers in the container storage area. Each container shall be marked with the date of receipt. CWM Emelle failed to label approximately 52 55-gallon drums staged in the north side of Building 700 that were not marked with the received date.

Building 1000 and PK-1000: Bulk Sampling and Staging Area: November 20, 2015

The inspectors, accompanied by Mr. Guy Coughlin, then inspected the bulk sampling and staging area. The bulk sampling area is used to sample untreated and treated roll-offs, and tanks prior to disposal in the landfill. At the time of the inspection, the inspectors observed two (2) 55-gallon drums of rinse and wash water to clean sampling instruments located in the overhead sampling area. Although still in use, the drums were both labeled as hazardous waste and dated 11-8-2015. Mr. Coughlin explained that the drums are changed out every 30 days.

Next, the inspectors visited the staging area for incoming trucks, also known as PK-1000. After arrival, trucks are staged in this area awaiting notification to advance to the landfill or stabilization. According to Mr. Coughlin, approximately 25-45 trucks are staged in this area on a daily basis. At the time of the inspection, nine (9) trucks and two (2) roll-offs were staged in this area awaiting stabilization.

The inspectors selected a random truck to perform a transporter inspection and ensure that the driver had a contingency plan and Alabama hazardous waste transporter permit onboard. The selected driver presented all necessary transporter documents to the inspectors upon request.

The inspectors then selected a truck belonging to Robbie D. Wood, driven by Mr. John Burke, to inspect for the required transporter documentation. Mr. Burke could not locate the transporter contingency plan or transporter permit. Later, during the closing conference, Mr. Burke provided the inspectors with both documents and the certificate of registration (see attachments W-Y). He reassured the inspectors that he would place copies of both documents on RDW trucks from that point forward.

Station 1002: Secondary Sampling Station: November 20, 2015

Lastly, the inspectors visited Station 1002, a secondary sampling area for the facility. According to Mr. Coughlin, this sampling station is used when the facility needs to perform more thorough sampling of bulk waste. The sampling station is equipped to allow for closer sampling the main sampling station. Similar to the main bulk sampling area described above, the inspectors observed two (2) 55-gallon drums of rinse and wash water located in the sampling area. No issues were observed in this area.

Perimeter Fence: November 20, 2015

EPA inspector Ms. Paula Whiting and ADEM inspector, Ms. Linda Knickerbocker, accompanied by Mr. Dewayne Speight, conducted a windshield tour of the facility's entire perimeter fence. During the tour, the inspectors identified two areas of concern. Along the perimeter fence that runs parallel to Highway 17, the inspectors identified an overgrown tree within close proximity to the fence (see Photos #53-54). South of the facility's main landfill staging pile, the ADEM inspector also identified an area along the fence that showed significant soil erosion (see Photos #55-56). No other issues were observed by the inspectors during the tour.

Records Review: November 17-20, 2015

Concurrent with the walkthrough, the records review portion of the inspection was led by ADEM inspector Linda J. Knickerbocker. During the fourth and final day of the inspection, all ADEM and US EPA inspectors, jointly completed the records review portion of the inspection. During the records review process, the following records were examined:

- Incoming Manifests for various randomly selected generators
- Outbound Manifests and Certificates of Disposal; again, randomly selected
- Hazardous Waste Storage Area Inspection Logs
- Hazardous Waste Tank Inspection Logs, especially January - June, 2014
- Stabilization Unit Process Logs
- Subparts BB and CC Inspection and Maintenance
- Operating Record, to included bulk container transfer logs and tank integrity tests
- Burial Coordinate Logs (plus all documentation for items buried at a specific set of coordinates)
- Closure/Post-Closure Plans to include liability insurance and financial assurance
- Contingency Plan
- Employee training records and randomly selected certificate (see attachments Z-AA)
- Training materials for 2015 (see Attachment AB)
- Job Titles/Job Descriptions
- Waste Analysis Plan
- SPCC Plan
- Work orders for maintenance on all RCRA Units (see Attachment R)

No deficiencies were found among the documents listed above with the following exceptions:

- Manifest #002917298GBF was found to have a chain of custody dating discrepancy. According to the manifest, there is a ten-day discrepancy between the date the generator certifies release of custody and the transporter (Robbie D. Wood) accepts custody of the waste (see Attachment AC). Other manifests were observed to have similar discrepancies during records review.

- The various inspection logs for hazardous waste storage areas (weekly), facilities (monthly), and tanks and tank systems (daily) list a remedial work order (RWO) on the date it is initiated, and on the date(s) when the work was done; in the interim, the logs do not include either a notation of the damage or the fact that an RWO is in place to address the damage. One RWO (#014919) was initiated on 3-26-15 to repair damage to the east and west baghouse walls of building 1200A. The work was completed on 6-11-15, but neither the damage to the walls or the work order were recorded at any time during the intervening months (see Attachment AD).

- Per Mr. Kronable, the contingency plan is being updated at this time. The version currently in use does not include a list of the fire extinguishers or their locations throughout the facility. The location and nature of all other emergency equipment is included in the plan.

- Tank integrity testing was last completed in December of 2014; the next testing event is scheduled for December of 2015. The minimum thickness for any portion of the tanks at CWM was 0.239; the code requirement for minimum thickness is 0.188. The code also requires that cathodic protection be at or below -850 millivolts; cathodic protection for the tanks is below the required threshold.

Closing Conference: November 20, 2015

The closing conference was held with representatives of CWM Emelle, ADEM and the EPA, and the deficiencies noted in this report were discussed. In addition, ADEM inspectors provided facility

personnel with a Preliminary Inspection Report citing all issues of concern that were observed during the inspection.

Post-Inspection Facility Response to Observations: December 22, 2015

On December 22, 2015, Mr. Robert W. Kronable III, the facility's Environmental Manager, emailed ADEM and U.S. EPA inspectors a detailed letter responding to the observations that were outlined in the ADEM Preliminary Inspection Report (see Attachment AE). The response outlines corrective measures performed by CWM Emelle, both during and post-inspection for 15 of the 30 total observations listed in the Preliminary Inspection Report.

Signed:

Kimberly V. Chavez, Inspector — Date: 02/03/2016

Concurrence:

Héctor M. Danois for — Date: 2/3/16
Acting Chief, Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch

ATTACHMENTS:

Attachment A:	Inspection Photograph Log and Photographs (56)
Attachment B:	Chemical Waste Management Emelle Facility Site Map (Truncated)
Attachment C:	Total On-site Personnel Diagram
Attachment D:	Robbie D. Wood Corrected Yard Inventory Log
Attachment E:	SDP for Disposal Cell Offloading Procedures
Attachment F:	SDP for Cell Mapping Procedures
Attachment G:	SDP for Macro-encapsulation Bags
Attachment H:	SDP for Macro-encapsulation Vault Boxes
Attachment I:	SDP for Drum Processing Procedures
Attachment J:	Landfill Mapping Documents for Manifest #013859918JJK
Attachment K:	Tank Farm Remedial Work Order
Attachment L:	Tank Farm Shift Summary Sheets
Attachment M:	Container Transfer Log for RO428-20 (used PPE)
Attachment N:	Documentation for treated split-sample taken by ADEM
Attachment O:	Waste Transfer Log for RO24-124
Attachment P:	CWM Receipt for Manifest #002402793GBF-RO6014
Attachment Q:	Waste Transfer Log for RO965-2
Attachment R:	Waste Profiles for Waste Diesel Oil and Antifreeze
Attachment S:	All Open Remedial Work Orders for RCRA units
Attachment T:	Container Process Report for RO76-10
Attachment U:	Waste Profile and Analytical Report for Purge Water
Attachment V:	Building 2000-Leachate Treatment Process Diagram
Attachment W:	Robbie D. Wood Transporter Permit
Attachment X:	Robbie D. Wood Contingency Plan
Attachment Y:	Robbie D. Wood Certificate of Registration
Attachment Z:	CWM 2015 Annual Refresher Training Records
Attachment AA:	CWM 2015 Training Certificate for Nelson Sturdivant
Attachment AB:	CWM 2015 Annual Refresher Training Materials
Attachment AC:	Waste Manifest #002917298GBF
Attachment AD:	Remedial Work Order for Baghouse originally dated 3/26/2014
Attachment AE:	CWM Response to Observations dated 12/22/2015
Attachment AF:	ADEM Satellite Accumulation Factsheet
Attachment AG:	ADEM Laboratory System Analysis Report of Sample from Building 1200A

ATTACHMENT A:

CHEMICAL WASTE MANAGEMENT

EMELLE, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPH LOG & PHOTOGRAPHS

NOVEMBER 17-20, 2015

DISCLAIMER:

DATES AND TIMES PRINTED ON INSPECTION PHOTOS MAY NOT REFLECT THE ACTUAL DATE AND TIME THE PHOTO WAS TAKEN. MUST REFERENCE PHOTOGRAPH LOG FOR ACCURATE DATE.

Photo #	Date	Location	Description
1	11/17/2015	RDW 10-Day Storage	Log w/missing delivery dates and times for containers on 11-6-2015
2	11/17/2015	RDW 10-Day Storage	Damaged/illegible hazardous waste label-container N48286
3	11/17/2015	RDW 10-Day Storage	Incomplete hazardous waste label-incorrect EPA ID-no waste information
4	11/17/2015	RDW 10-Day Storage	Container of PCB-contaminated waste
5	11/17/2015	RDW 10-Day Storage	Container with PCB label attached
6	11/17/2015	Trench 22 Cell #4	Wide view of macroencapsulation vaults; coordinated O-P & 11-12
7	11/17/2015	Trench 22 Cell #4	Label on one macroenscapsulation vault; coordinates O-P & 11-12
8	11/17/2015	Trench 22 Cell #4	Zoomed in picture of inaccessible cardboard box in landfill
9	11/17/2015	Trench 22 Cell #4	Unknown machinery in landfill next to macroencapsulation vaults
10	11/17/2015	Trench 22 Cell #4	Unknown waste containers in landfill next to macroencapsulation vaults
11	11/17/2015	Trench 22 Cell #4	Label on 55 gallon drum in landfill-Duke Energy-Drum #032
12	11/17/2015	Trench 22 Cell #4	Label on same 55 gallon drum (above) in landfill-Profile AL402007
13	11/17/2015	Bldg. 1400 "Tank Farm"	Dirt and rainwater collected in the bermed floor of tank farm
14	11/17/2015	Bldg. 1400 "Tank Farm"	55 gallon drum of used PPE at capacity outside of tank farm control room
15	11/17/2015	Bldg. 1400 "Tank Farm"	Zoomed in picture of hazardous waste label on SAA drum
16	11/18/2015	Wet Chem Lab-SAA	Two (2) side-by-side 55 gallon drums in wet chem lab back area
17	11/18/2015	Wet Chem Lab-SAA	Top of left-side drum in wet chem lab SAA dated 11-2-2015
18	11/18/2015	Wet Chem Lab-SAA	Top of right-side drum in wet chem lab SAA dated 10-2-2016
19	11/18/2015	Lab Sample Storage Rm	Row of containers in lab's sample storage room
20	11/18/2015	Lab Sample Storage Rm	Row of containers in lab's sample storage room
21	11/18/2015	Lab Sample Storage Rm	Row of containers in lab's sample storage room
22	11/18/2015	Lab Sample Storage Rm	Row of containers in lab's sample storage room
23	11/18/2015	Lab Sample Storage Rm	Row of containers in lab's sample storage room; bucket samples usable
24	11/18/2015	Lab Sample Storage Rm	Row of containers in lab's sample storage room
25	11/18/2015	Bldg./PK-2200	Roll-off label with scratched off year
26	11/18/2015	Bldg./PK-2200	Roll-off label with faded month and date (only has year)
27	11/18/2015	Bldg. 300 Hvy Equip.	Both drums described below shown side-by-side
28	11/18/2015	Bldg. 300 Hvy Equip.	55 gallon drum of used oil filters-lid removed for picture to show volume
29	11/18/2015	Bldg. 300 Hvy Equip.	55 gallon drum of waste antifreeze w/ hazardous waste label
30	11/19/2015	Bldg. 700-Bay Area	Both side-by-side 55 gallon SAA drums for used PPE in bay area
31	11/19/2015	Bldg. 700-Bay Area	55 gallon SAA drum for used (non-contaminated) PPE labeled as non-HW
32	11/19/2015	Bldg. 700-Bay Area	HW label on 55 gallon SAA drum in bay area for contaminated PPE
33	11/19/2015	Bldg. 604	Rinse water 55 gallon drum currently in use yet labeled & dated 11-9-2015

Photo #	Date	Location	Description
34	11/19/2015	Bldg. 520	Tank connections w/RCRA BB tags painted over
35	11/19/2015	Bldg. 603	Multiple containers of mercury waste
36	11/19/2015	Bldg. 603	CWM lab label on container of mercury waste dated " 14 July 2014"
37	11/19/2015	Bldg. 406	Picture of hazardous waste label on RO76 dated 9-25-2010
38	11/19/2015	Bldg. 406	Corrected label put over above mentioned label on RO76 (dated 9-25-2015)
39	11/19/2015	Bldg. 406	Rainwater accumulated in secondary containment of roll-off storage area
40	11/19/2015	Bldg. 1700	Small collection of liquid below leachate tank; unable to identify source
41	11/19/2015	Bldg. 1700	Small collection of liquid below leachate tank; unable to identify source
42	11/19/2015	Monitoring Wells	Trench 10; SM-07 (2 wells)
43	11/19/2015	Monitoring Wells	Trench 10; SM-07A: Concrete edge missing
44	11/19/2015	Monitoring Wells	Trench 16; PM-17: Concrete around base cracked/damaged (pic 1 of 2)
45	11/19/2015	Monitoring Wells	Trench 16; PM-17: Concrete around base cracked/damaged (pic 2 of 2)
46	11/19/2015	Monitoring Wells	Trench 9; SM-05 A-D; 55 gal drum of "purge water" present; no label
47	11/19/2015	Bldg. 900 Tank Rm	Wheel wash tanks; Leak coming from "clean" tank (left tank in picture)
48	11/20/2015	Bldg. 2000	Area near filter press-puddles of unknown liquid on floor- source unknown
49	11/20/2015	Bldg. 2000	Area near filter press-puddles of unknown liquid on floor-wall damage
50	11/20/2015	Bldg. 700-North End	CWM label missing Start Accumulation Date; Manifest 002735786GBF-1
51	11/20/2015	Bldg. 700-North End	Same drum as above; Generator Label dated 9-16-2015
52	11/20/2015	Bldg. 700-North End	Drum column containing drums w/ missing dates
53	11/20/2015	Perimeter Fence	Section of fence along Highway 17 w/overgrown trees (photo 1 of 2)
54	11/20/2015	Perimeter Fence	Section of fence along Highway 17 w/overgrown trees (photo 1 of 2)
55	11/20/2015	Perimeter Fence	Section of fence with soil erosion at bottom (photo 1 of 2)
56	11/20/2015	Perimeter Fence	Section of fence with soil erosion at bottom (photo 1 of 2)

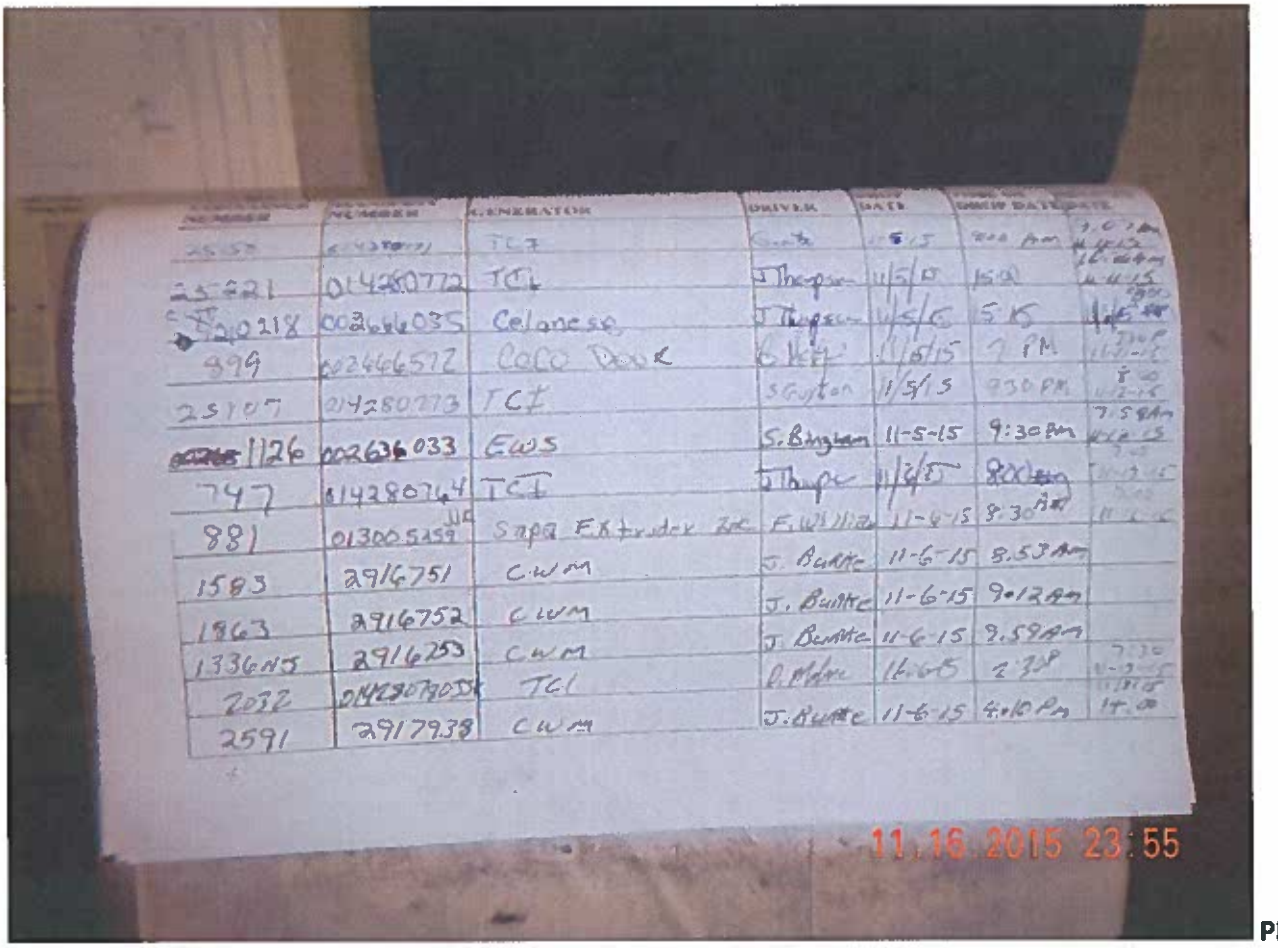


PHOTO #1

PHOTO #2

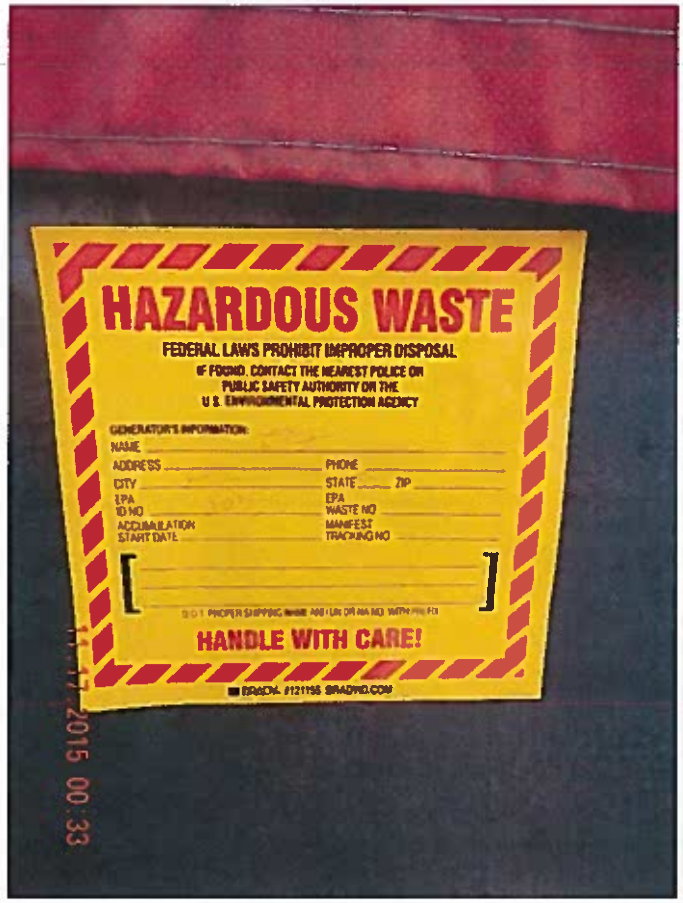


PHOTO #3

PHOTO #4

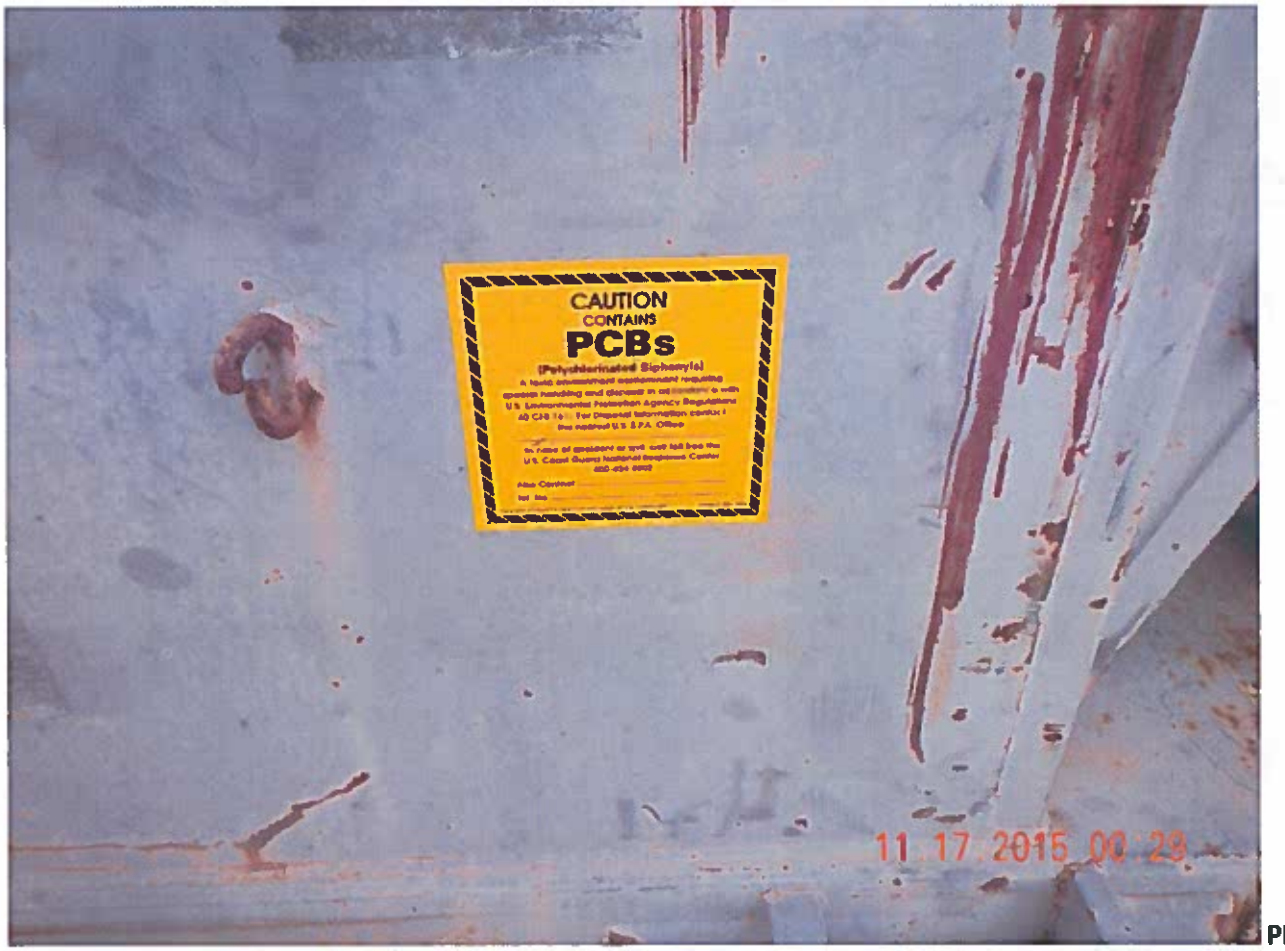


PHOTO #5

PHOTO #6

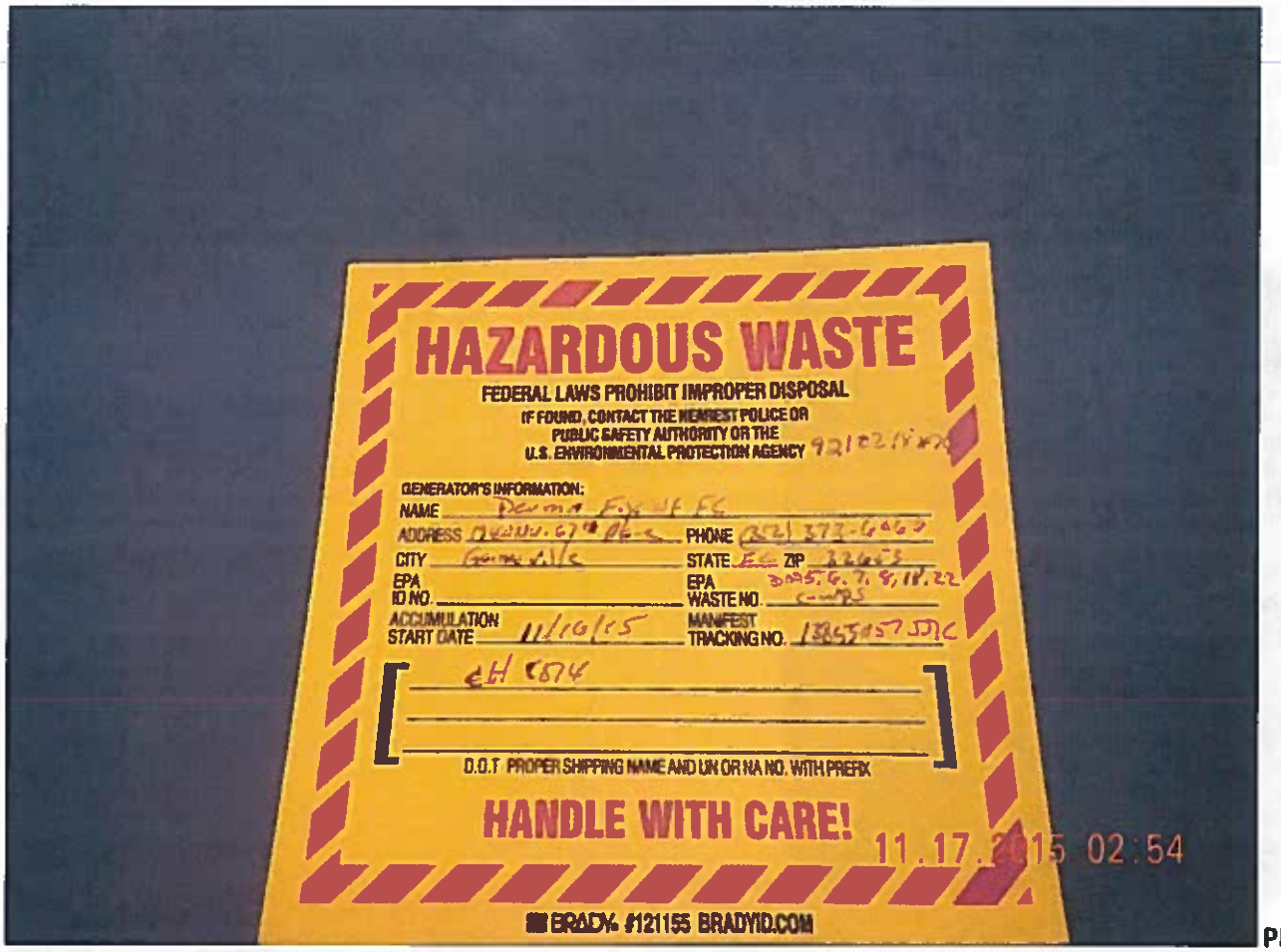


PHOTO #7

PHOTO #8

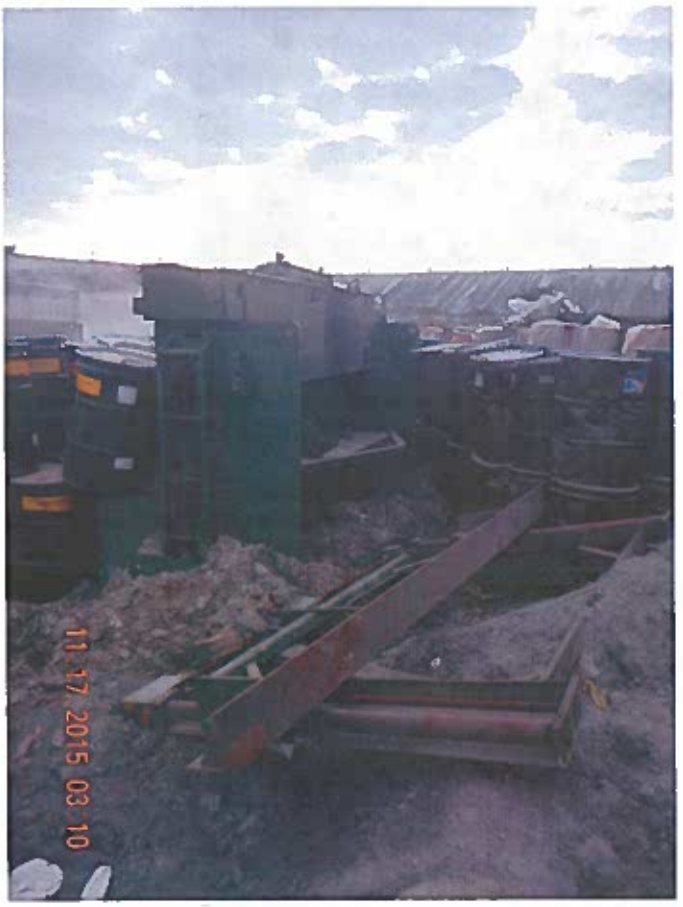


PHOTO #9

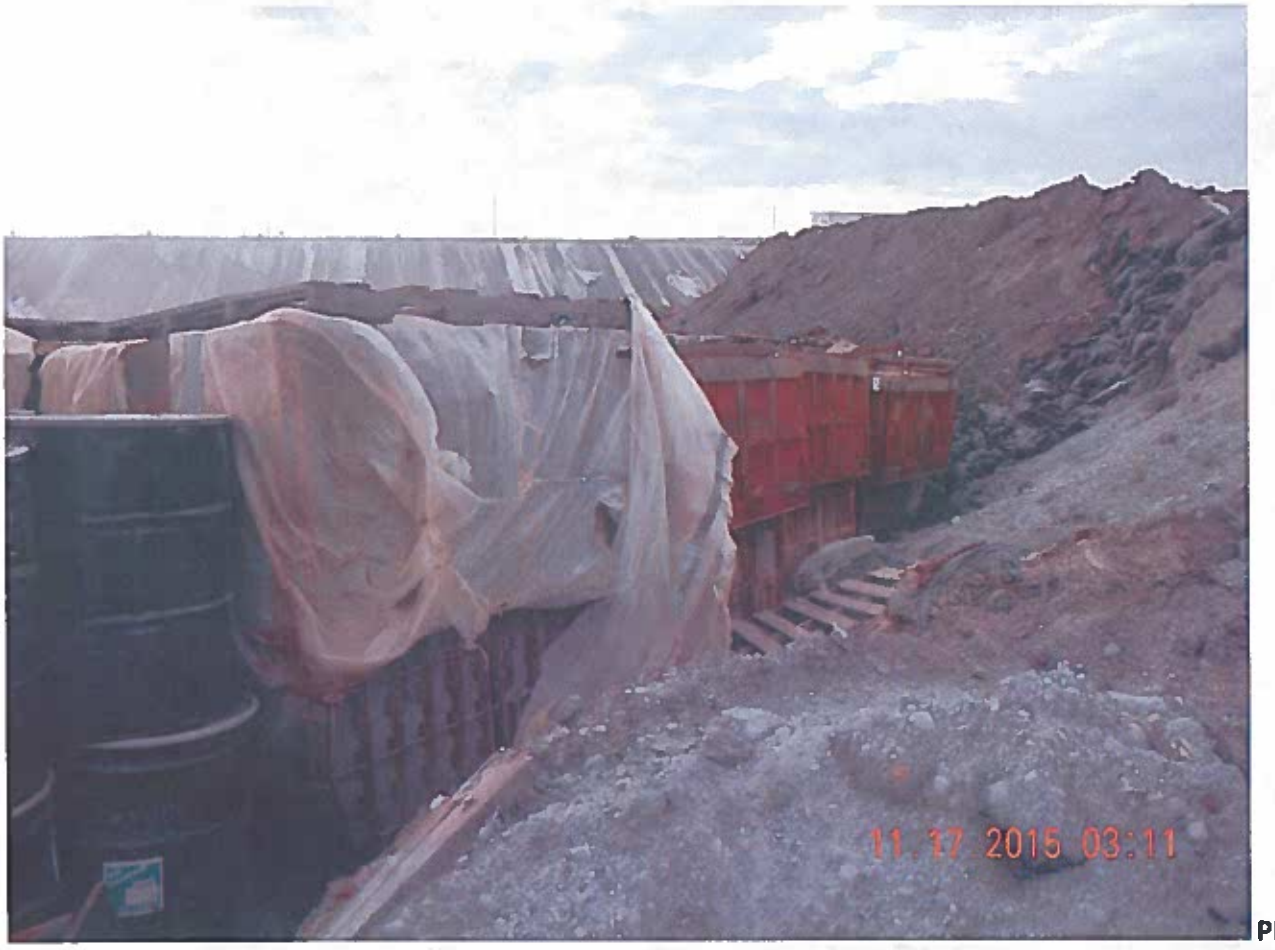


PHOTO #10

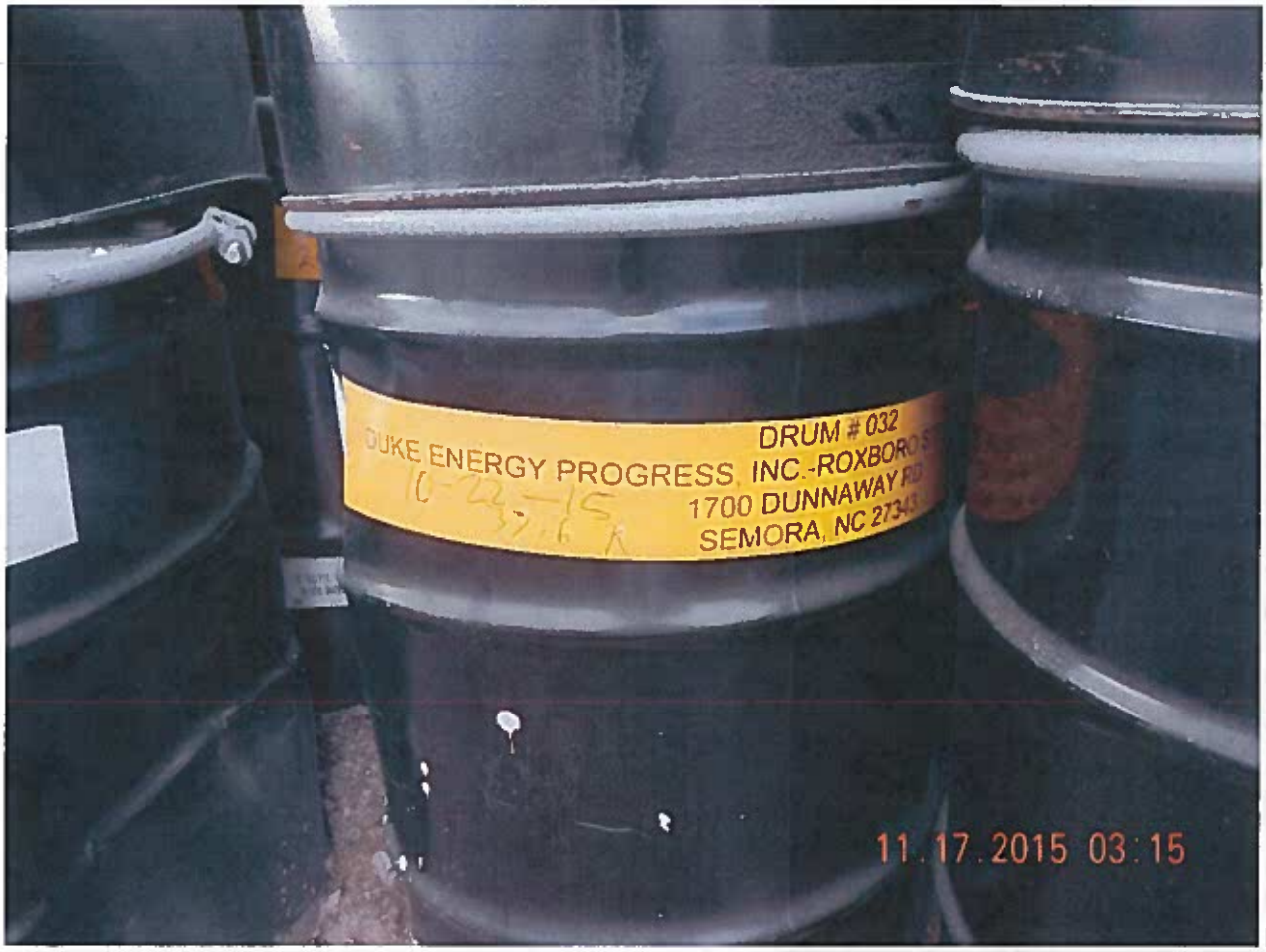


PHOTO #11

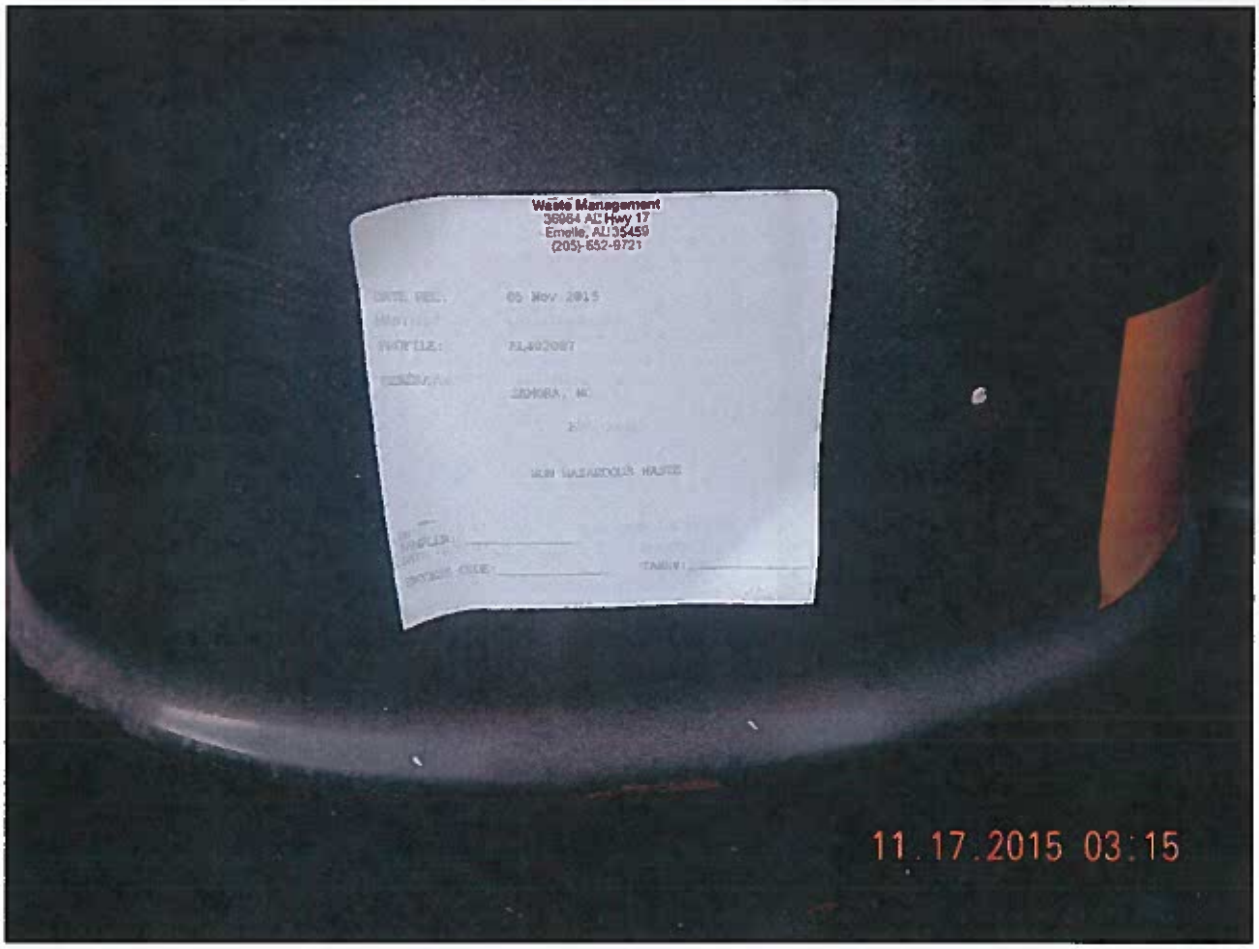


PHOTO #12

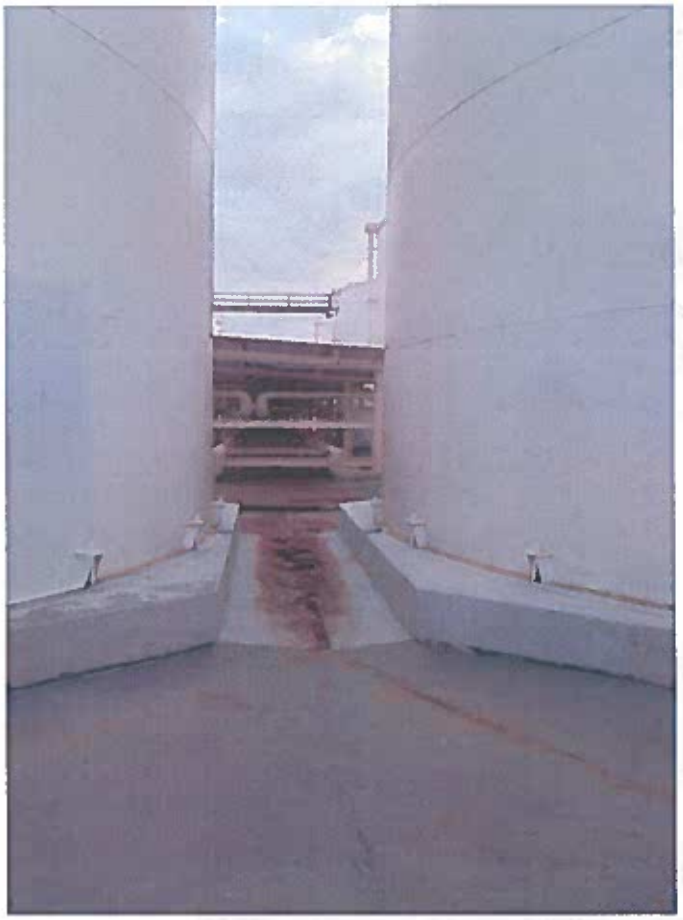


PHOTO #13

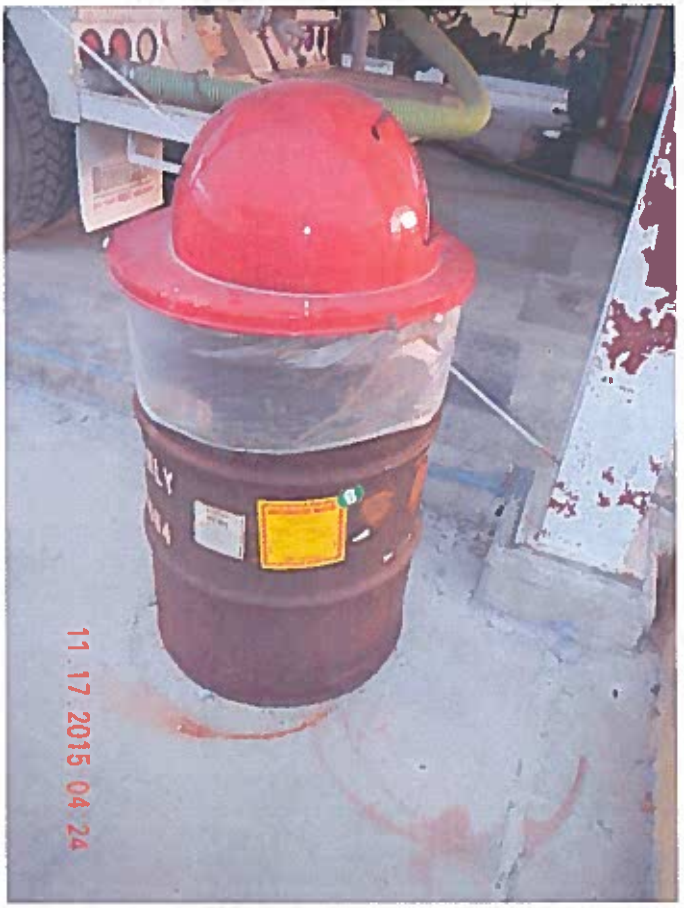


PHOTO #14

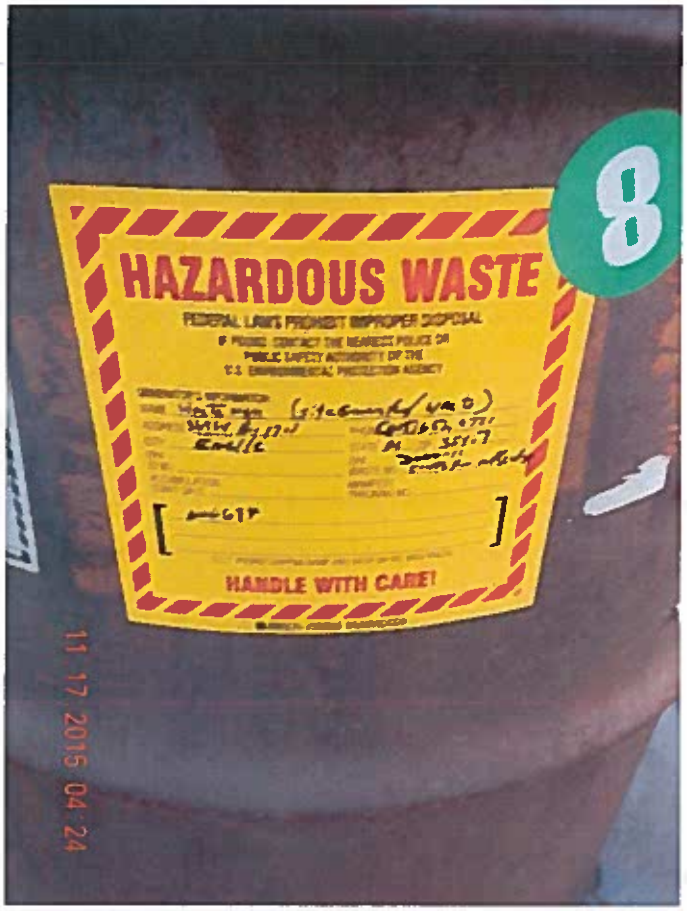


PHOTO #15

PHOTO #16

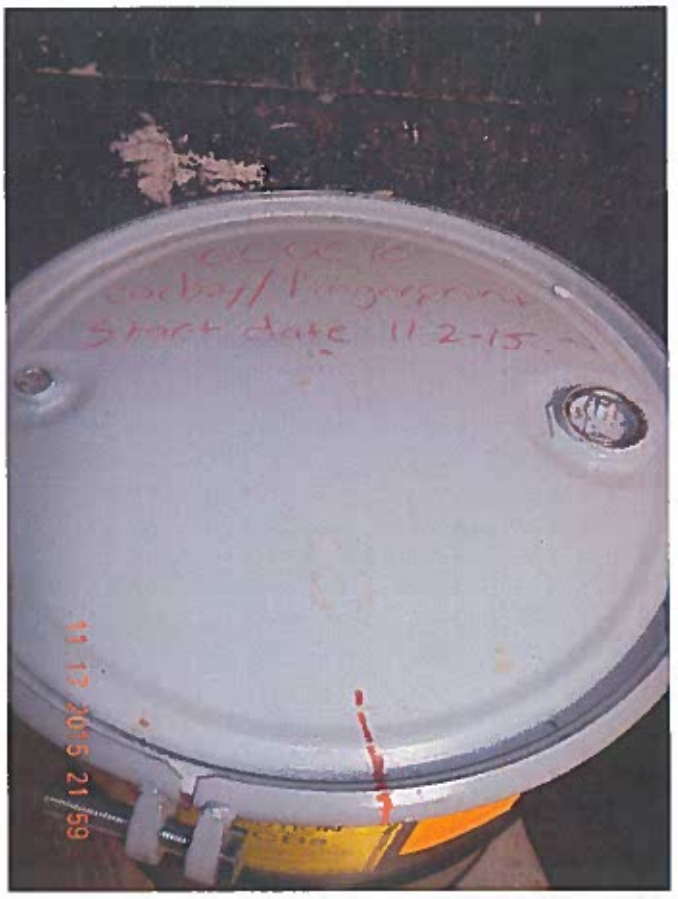


PHOTO #17

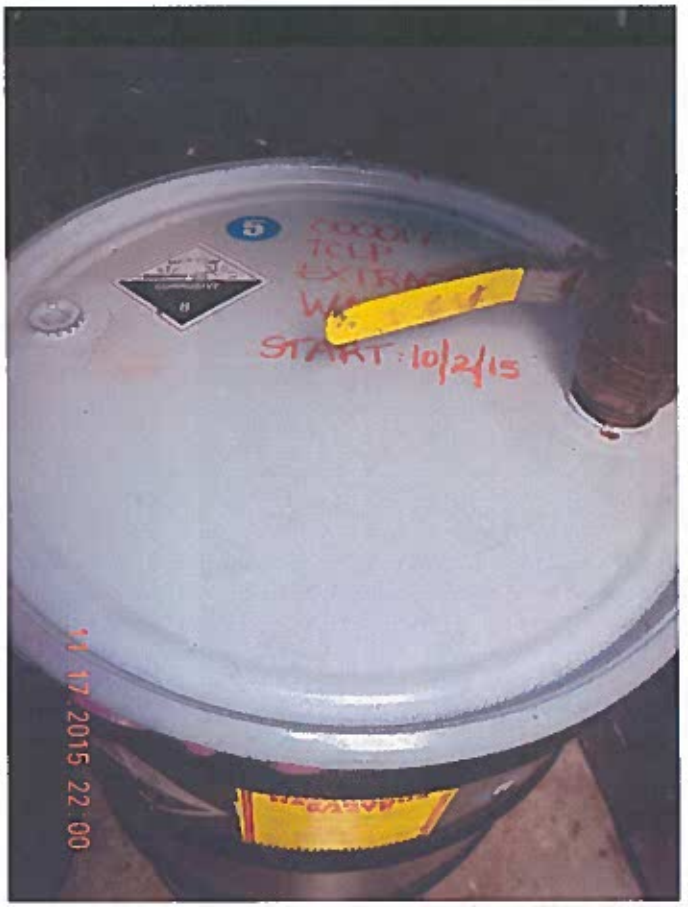
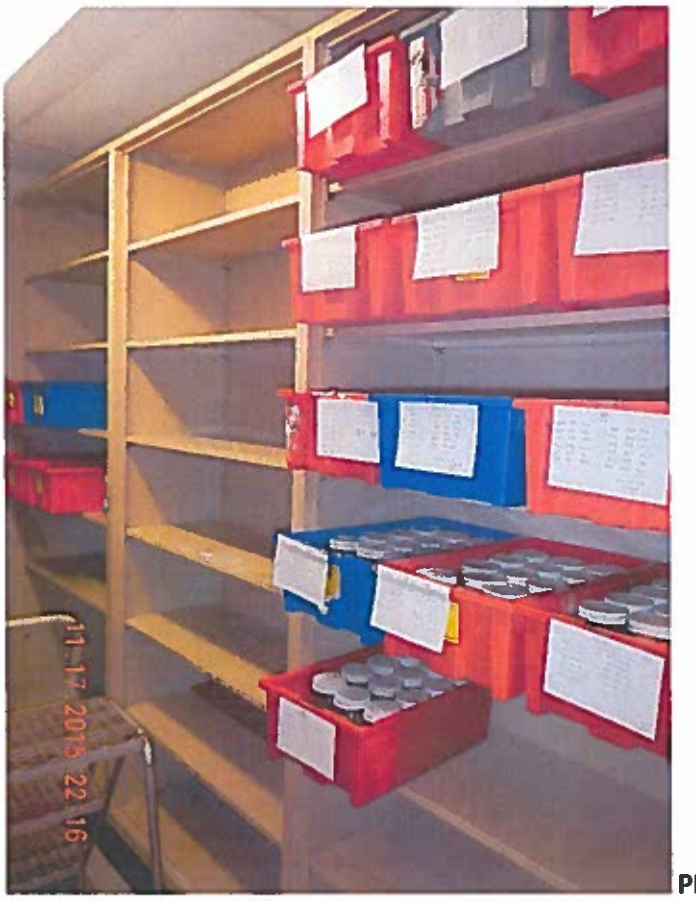


PHOTO #18

PHOTO #19

PHOTO #20



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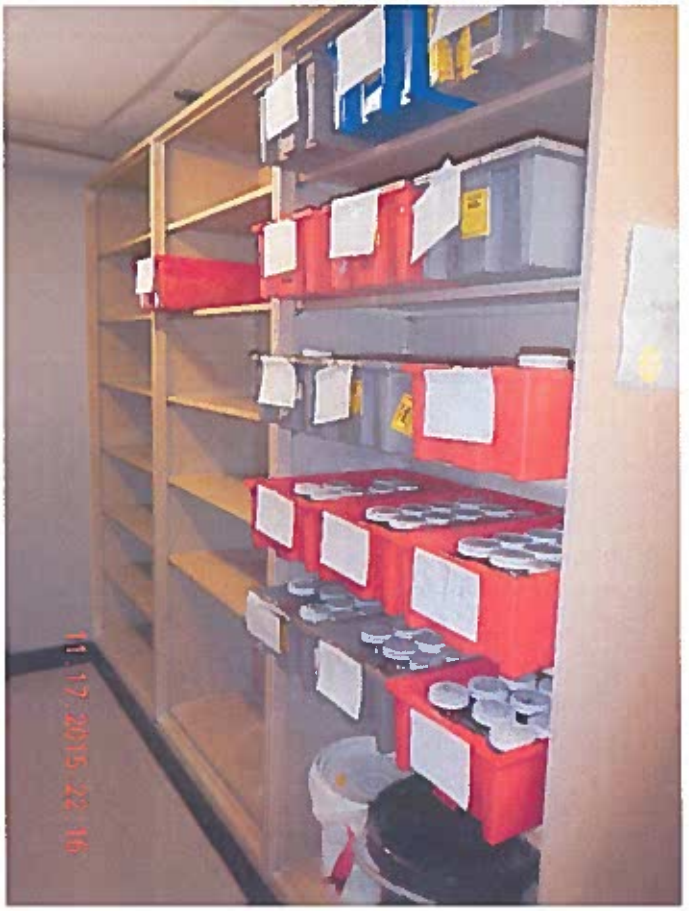

PHOTO #22

PHOTO #23

PHOTO #24

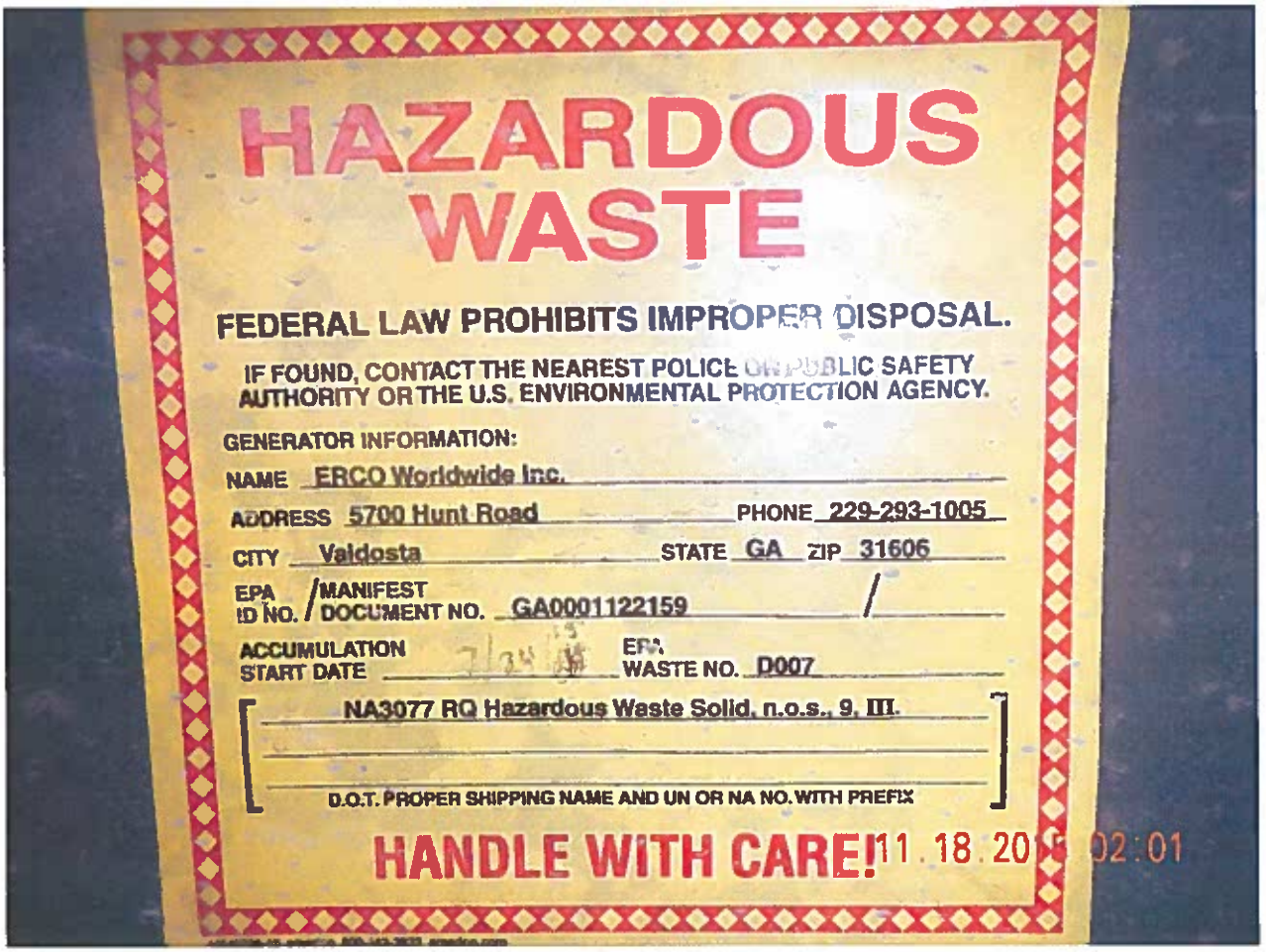

PHOTO #25

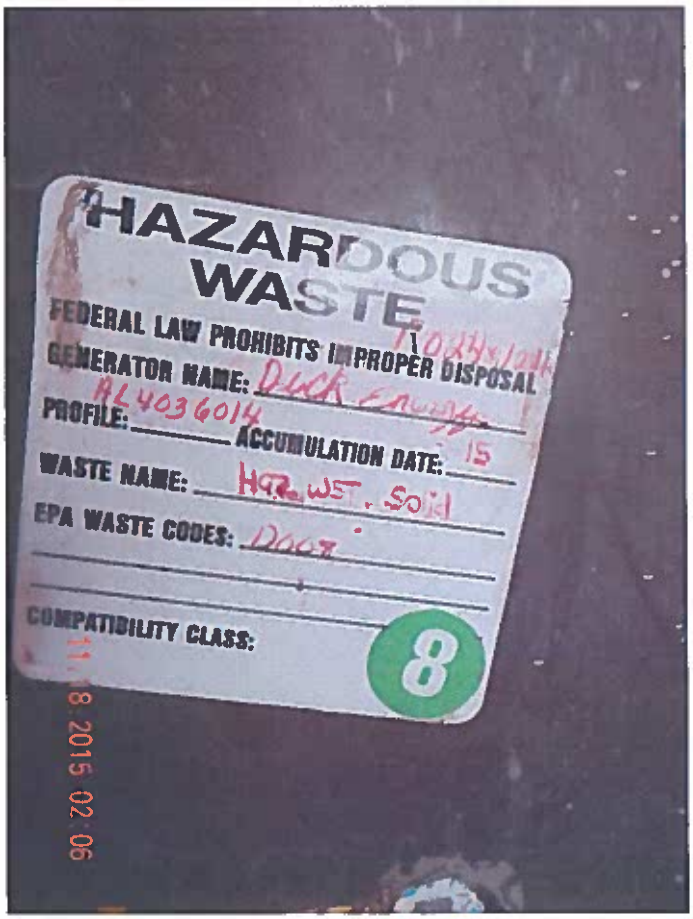

PHOTO #26

PHOTO #27

PHOTO #28

PHOTO #29

PHOTO #30

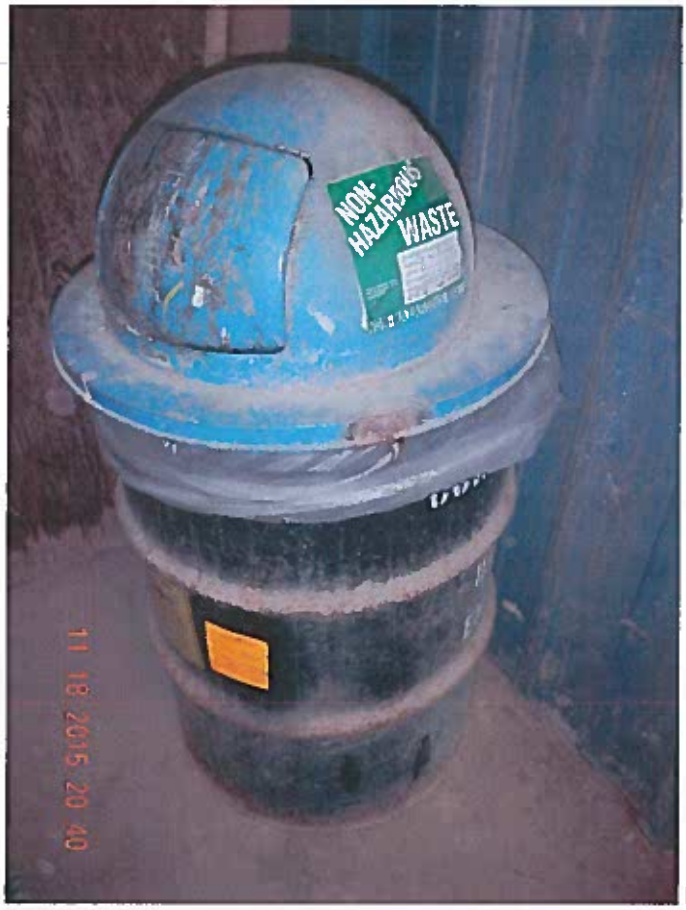

PHOTO #31

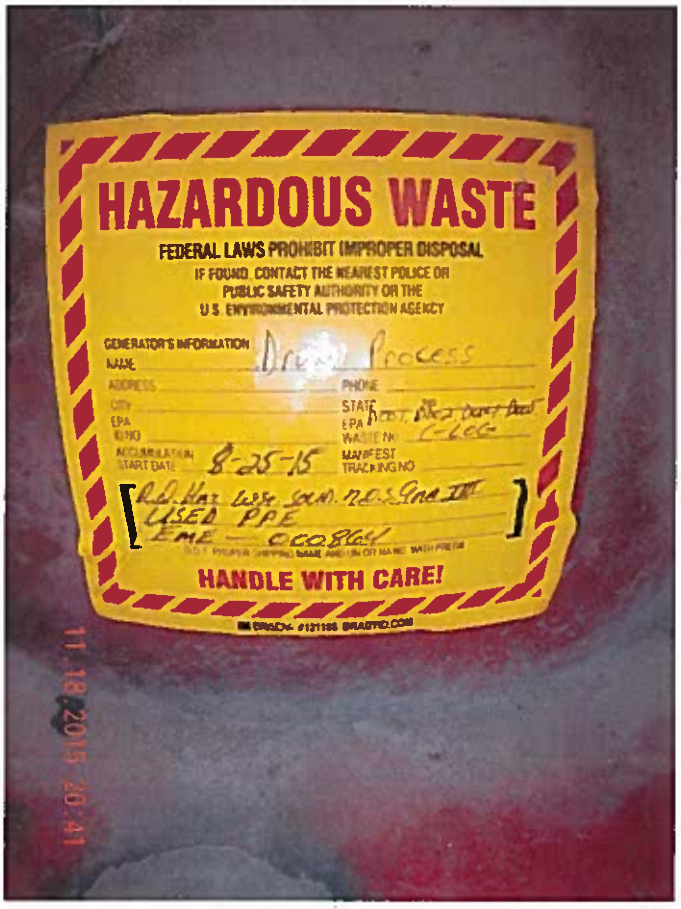

PHOTO #32

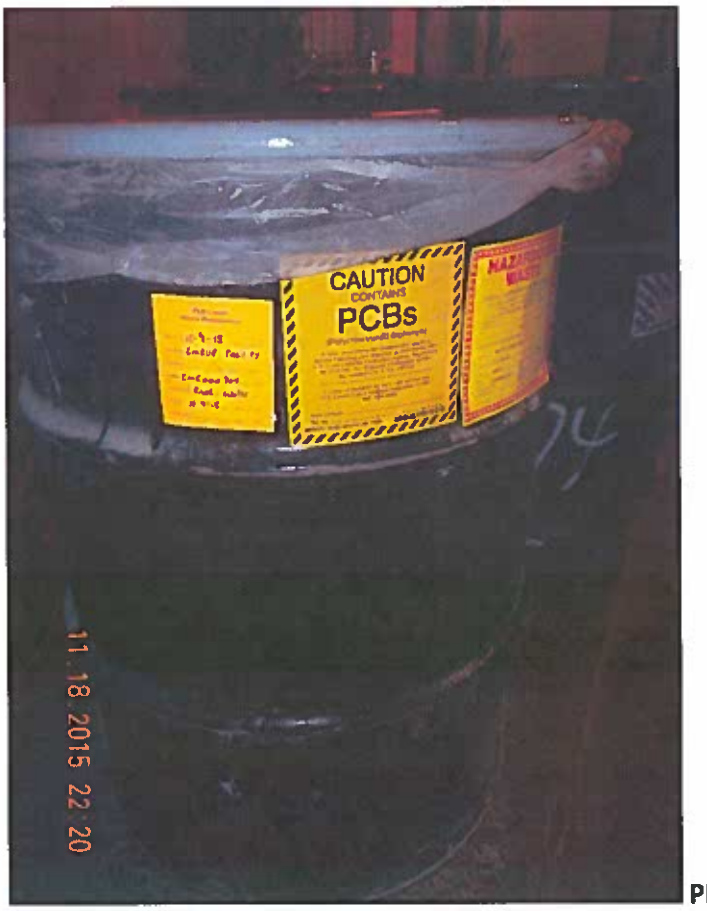

PHOTO #33

PHOTO #34

PHOTO #35

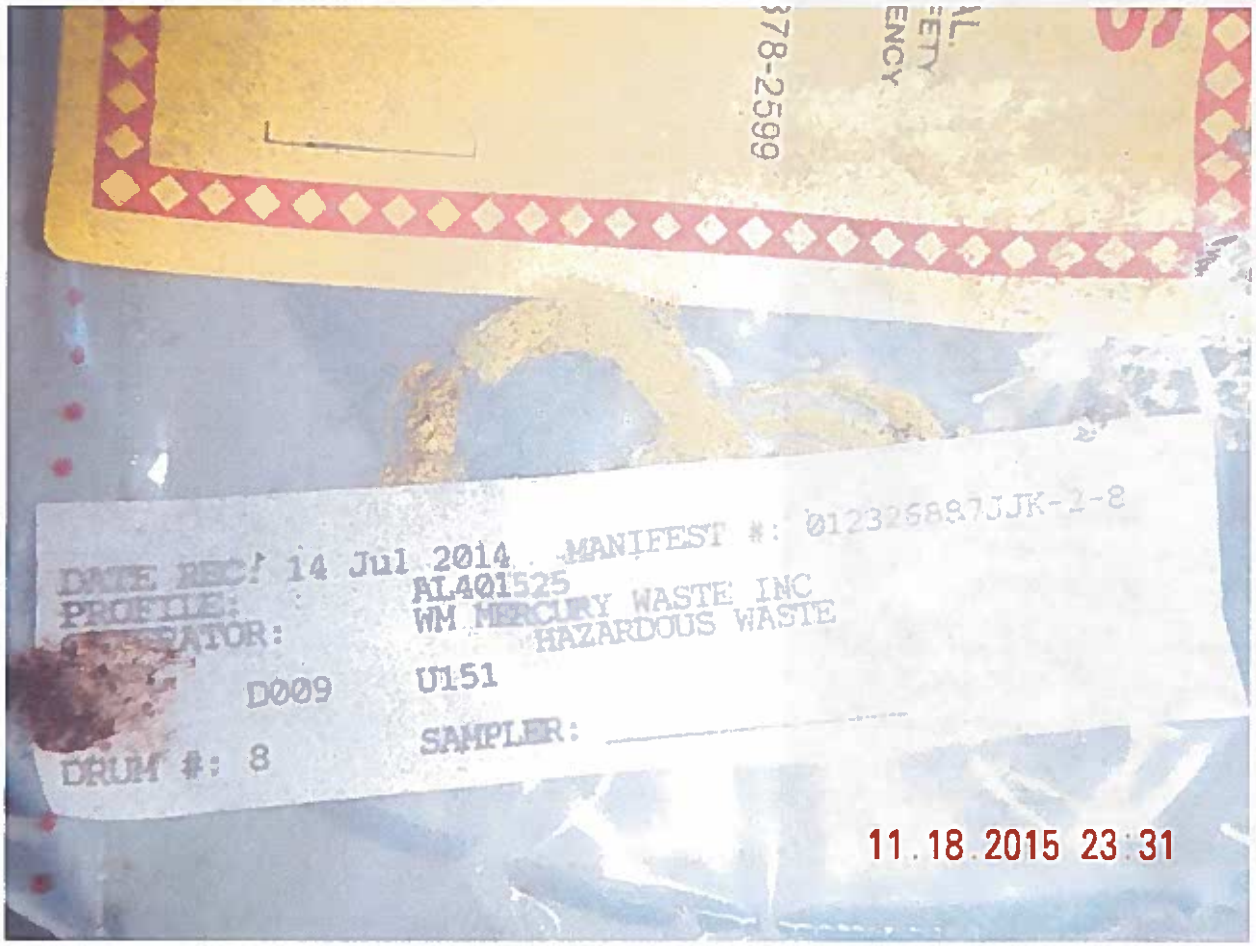

PHOTO #36

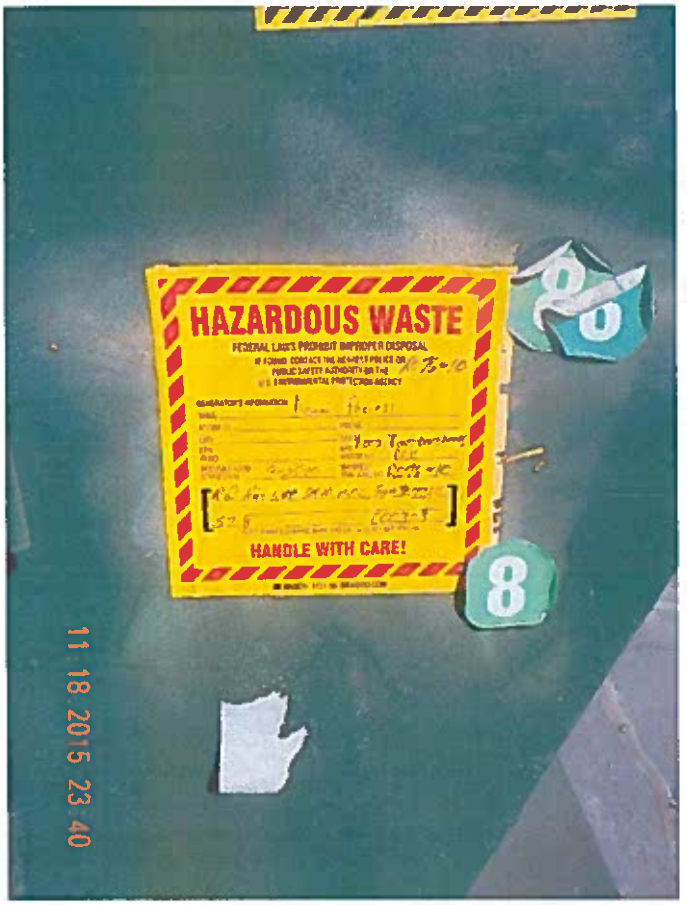

PHOTO #37

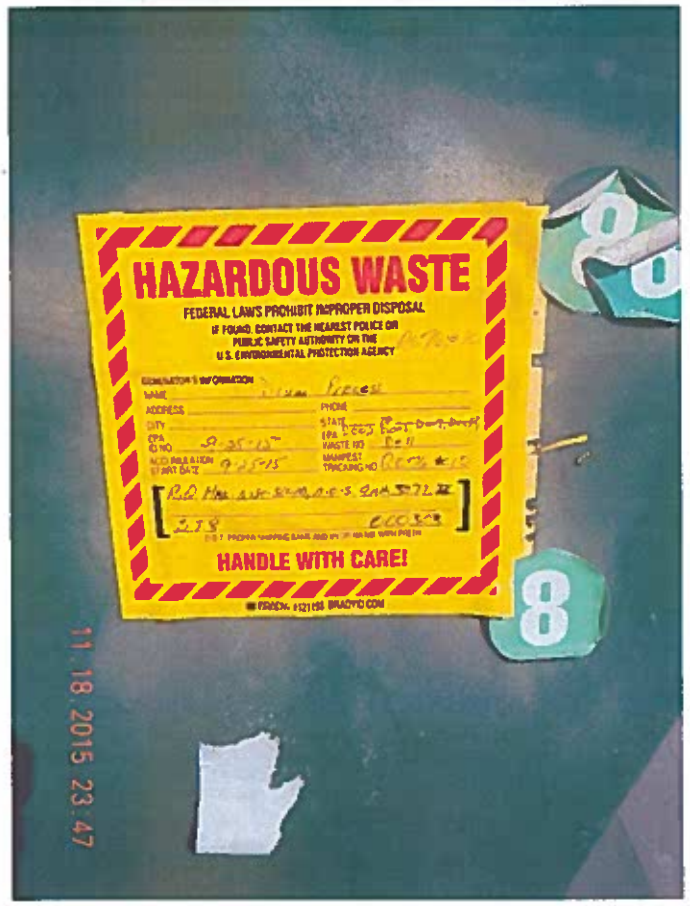

PHOTO #38

PHOTO #39

PHOTO #40

PHOTO #41

PHOTO #42

PHOTO #43

PHOTO #44

PHOTO #45

PHOTO #46

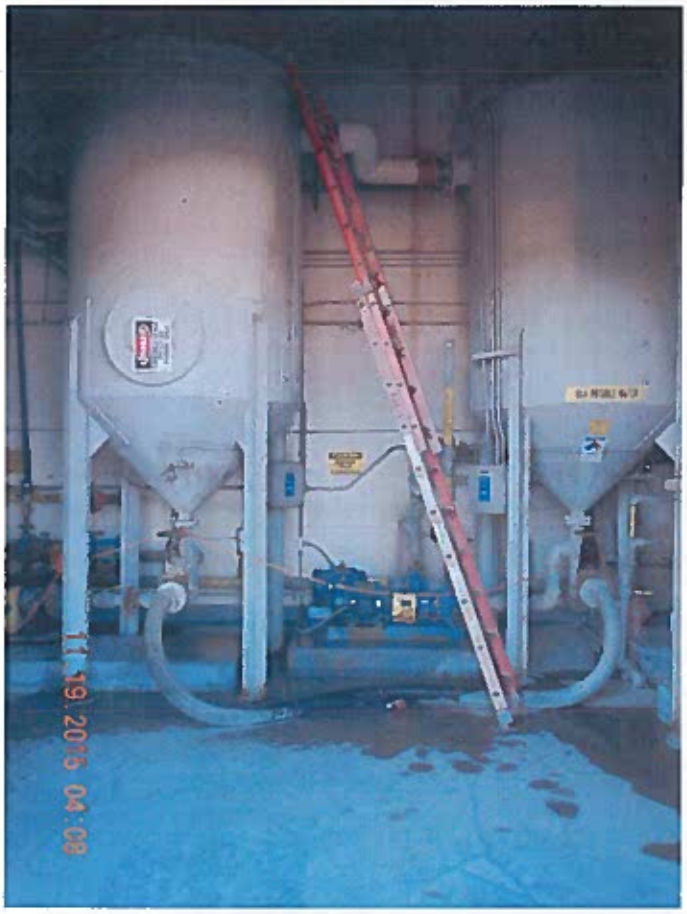

PHOTO #47

PHOTO #48

PHOTO #49

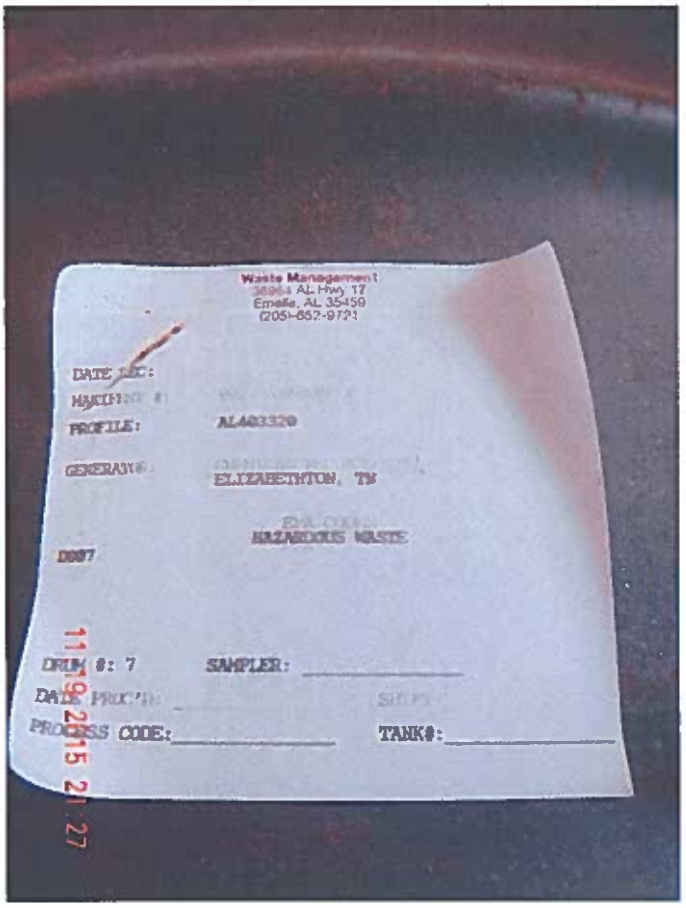

PHOTO #50

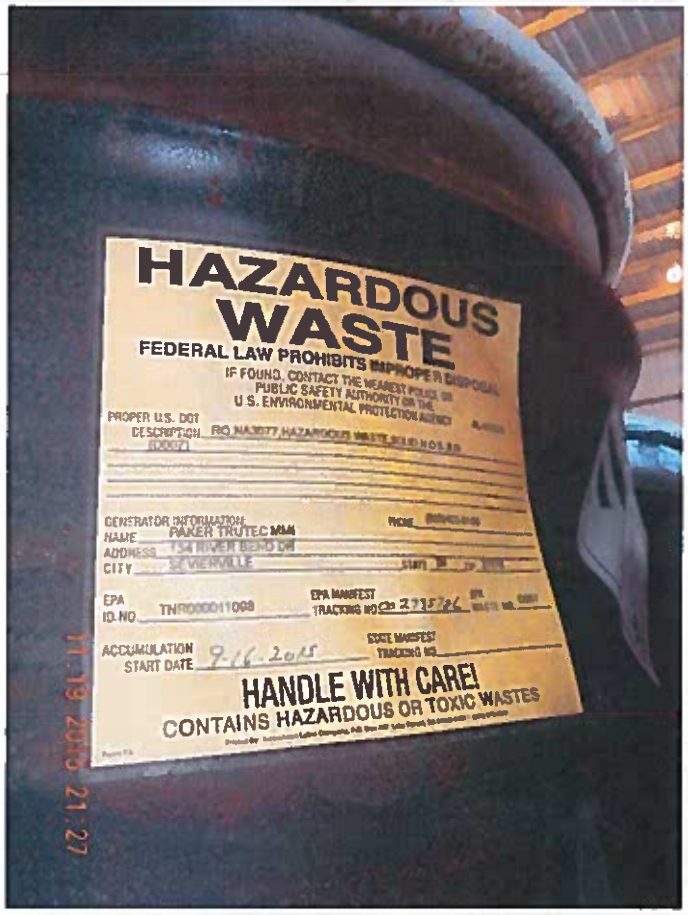

PHOTO #51

PHOTO #52

PHOTO #53

PHOTO #54

PHOTO #55

PHOTO #56